

# Compass Group UK & Ireland

## Business Management System (BMS) Manual (Version 18)

### Instructions for Use

This is an internal document intended for ISO Managers and Auditors. It is not to be externally distributed. It is available to unit/site managers or operational sites on the HSE Website via Compass Connect.

### Document History

| Version:  | Date:         | Summary of Changes:                                                                                                | Approved by:                                                                    |
|-----------|---------------|--------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|
| <b>1</b>  | Mar 2008      | All Pages: Changes to meet the requirements of OHSAS 18001:2007, Appendices A, B, C: Changes to company structures | Mike Batchelor,<br>HSE Dept. Director,<br>Compass Group, UK & Ireland           |
| <b>2</b>  | Jan 2009      | All Pages: Changes to meet the requirements of new ISO Standard ISO 9001-2008                                      | Mike Batchelor,<br>HSE Dept. Director,<br>Compass Group, UK & Ireland           |
| <b>3</b>  | May 2009      | All Pages: Changes to company processes                                                                            | Chris Williams, HSE Director, Compass Group UK & Ireland                        |
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| <b>6</b>  | Aug 2015      | Scope review update                                                                                                | Chris Williams, HSE Director,<br>Compass Group UK & Ireland                     |
| <b>7</b>  | Feb 2016      | ISOQAR review update (Evaluation)                                                                                  | Chris Williams, HSE Director,<br>Compass Group UK & Ireland                     |
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All links within this document are only accessible when logged into the Compass Connect platform, which only authorised Compass colleagues have access.

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## 1. Introduction

This manual describes the Business Management System for Compass Group UK & Ireland and sets out how the system maintains alignment to the requirements of the following standards:

- ISO 9001:2015 – Quality Management
- ISO 14001:2015 – Environmental Management
- ISO 45001:2018 – Occupational Health and Safety Management

This document is a signposting document– It contains links to the relevant web pages and related system/ process documentation and identifies the relevant owners.

## 2. Certification of Registration

| Standard              | Certificate number | Initial registration date | Expiry date |
|-----------------------|--------------------|---------------------------|-------------|
| <b>ISO 9001:2015</b>  | 2898-QMS-001       | 12 Apr 2002               | 12 Apr 2026 |
| <b>ISO 14001:2015</b> | 2898-EMS-001       | 12 Apr 2002               | 12 Apr 2026 |
| <b>ISO 45001:2018</b> | 2898-OHS-001       | 1 May 2007                | 12 Apr 2026 |

## 3. External Auditors

Compass Group UK & Ireland engage with ISOQAR part of the Alcumus Group to conduct our third party external auditing of the operations in our business. Audits take place in two phases each year, usually around February/ March and September / October with 60 audit days being accounted for over the two phases.

In addition to this, Compass Group UK & Ireland have a Primary Authority Partnership with Luton Borough Council for all Food Safety activities. With this Primary Authority Partnership comes an element of auditing, monitoring and review and we now have a National Inspection Plan in place which was rolled out in 2024 with all local authorities in England.

## 4. Context of the Organisation

### 4.1 Understanding the organisation and its context

Compass Group UK & Ireland are part of Compass Group PLC, the world's leading catering and support services Company. We employ over 590,000 people in over 25 countries.

The UK & Ireland part of the business employ a team of around 40,000 people. Between us we supply catering and support services, including facilities management and security, to private business and public sector organisations.

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

## **Goals & Values 1, 3, 5**

One, three, five stands for:

### **One Compass:**

Supporting our front-line teams delivering to our clients.

### **Three P's:**

1. **Purpose:** A clear social purpose to do the right thing;
2. **People:** Consistently doing the right things;
3. **Performance:** Always hitting our targets.

### **Five Values:**

**Integrity** - we set the highest ethical and professional standards at all times. We want all our relationships to be based on honesty, respect, fairness and a commitment to open dialogue.

**Passion** – we are passionate about delivering superior food and service and take pride in achieving this. We look to replicate success, learn from mistakes, develop the ideas, innovation and practices that will help us improve and lead our market.

**Teamwork** – we encourage individual ownership but work as a team. We value the expertise, individuality, contribution of all colleagues, working in support of each other and readily sharing good practice in pursuit of shared goals.

**Responsibility** – we take responsibility for our actions, individually and as a Group. Every day, everywhere, we look to make a positive contribution to the health and wellbeing of our customers, the communities we work in and the world in which we live.

**Can do safely** – we take a positive and commercially aware 'can-do' approach to the opportunities and challenges we face.

### **Five Golden Rules:**

1. Health and safety is our number one priority make sure it is your number one priority too;
2. Corruption, bribery or any illegal activity of any kind is strictly prohibited;
3. Treat your colleagues fairly and without discrimination;
4. Always be professional, polite, honest and transparent when dealing with clients, customers, suppliers and colleagues;
5. Don't do anything which might damage the reputation of Compass.

Key facts:

- **Turnover:** £3.5 billion
- **Employees:** More than 40,000
- **Client sites:** 5,000 (6,200 individual units)

For further information, please visit: [www.compass-group.co.uk](http://www.compass-group.co.uk)

Compass UK & Ireland is made up of the following business sectors:

- **Business & Industry:** Eurest Services, 14Forty, LSS, Dine Catering
- **Fine Dining:** RA Group, RA Venues, Rapport, Rocket, Grazing
- **Education:** Chartwells, Universities & Colleges, Pabulum, PPP-IML
- **Sports, Leisure & Hospitality:** Levy UK & Ireland, Payne and Gunter, Keith Prowse, Lime Venue Portfolio, Jockey Club Catering, Venues Collection

- **Compass One:**
  - **Healthcare:** Medirest, White Oaks, Circle Health Group;
  - **Retail & Instore:** One Retail;
  - **Defence, Marine and Aerospace:** ESS;
  - **Energy, Government & Infrastructure:** ESS;
  - **Cuisine Centre:** St Albans and St Helens
- **Catering Services Ireland including Glanmore**
- **CH&Co Catering:**
  - **CH&Co:** Absolute Catering, Principal Catering
  - **Gather and Gather**
  - **Company of Cooks**
  - **Vacherin**
  - **Gather & Gather Ireland:** Host Management, Catermasters, Creativeevents, The Brookwood Partnership, Harbour and Jones, Concerto
  - **Create Foods**
  - **Inspire Catering:** Eve, Charlton House, Public Restaurant Partner
  - **Blue Apple**

#### 4.1.1 External Issues

External issues relevant to Compass are identified below:

| PESTLE            |  | External Issues                                                                                                                                                                                                         | Impact on the BMS                                                                                                  | Central Functions                                                                               |
|-------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| <b>Political</b>  |  | Changes to Government policies, tax, levies, Government stability/changes, Brexit, policies, minimum wage, international unrest, and supply chain impact                                                                | Purpose and strategic direction, business performance and growth                                                   | Finance, Legal Services, Commercial                                                             |
| <b>Economic</b>   |  | Price of products and services, demand and supply, sales and retention, inflation rates, interest rates, foreign exchange rates, economic growth patterns, unemployment, competition, cost of living crisis             | Purpose and strategic direction, business performance and growth                                                   | Finance, Legal Services, Commercial, Profit Protection, Sales, Retention                        |
| <b>Social</b>     |  | Labour practices, resources, knowledge, capability, diversity, modern slavery/human rights, culture, population, demographics, cultural trends, fashion, tastes, trends, consumer protection, PR, cost of living crisis | Purpose and strategic direction, relationships with our clients, customers, suppliers and other interested parties | Marketing, Human Resources, Communications, Corporate Responsibility, Health and Wellbeing, HSE |
| <b>Technology</b> |  | Communication, cyber security, IT systems, technology advances, provision of products and services, information security, new innovation                                                                                | Provision of products and services, keep up with latest advances                                                   | IT, Business Continuity, Communications, Commercial                                             |
| <b>Legal</b>      |  | Food safety, PCI compliance, GDPR, Food Information Regulations, employment vetting, environmental legislation, consumer, safety standards, labour, discrimination, anti-trust, corruption, health                      | Comply with relevant legislation and mitigate risk of non-compliance                                               | Legal Services, HSE, impacts on all Central Functions and operations                            |

|                    |                                                                                                                                                                                                                                                                                             |                                                                  |                                          |
|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|------------------------------------------|
|                    | and safety, environmental, IP law, HSE claims/fines,                                                                                                                                                                                                                                        |                                                                  |                                          |
| <b>Environment</b> | Energy use, GHG emissions, fuel use, procurement and use of products and services, waste disposal, water use, discharge to wastewater, pollution prevention, climate change, land use, biodiversity, planning and building, pollution, statutory nuisances, waste management, water quality | Manage environmental impacts and mitigate risk of non-compliance | Legal Services, HSE, Sustainability Team |

## Internal Issues

Within Compass Group UK and Ireland, internal issues are managed in line with our business hierarchy. These are identified within the relevant sector and central functions organisation charts and recorded using the following means:

- Compass Major Risk Assessment (MRA) register
- Statutory organisation reports
- Internal audit reports and action plans
- External audit reports and action plans
- Customer and client input (including audit and feedback)

## 4.2 Understanding the needs and expectations of interested parties

The interested parties that are relevant to the BMS are identified within the **BMS Interested Parties** (reviewed annually, last review November 2025). It should also be noted that we as an organisation have a very broad range of clients which haven't been listed and their needs are defined within their contractual arrangements.

## 4.3 Scope of the Business Management System

The requirements of the Business Management System apply to all subsidiaries and operating sectors of Compass Group UK & Ireland.

The management system covers the provision of catering (Restaurants, Retail and Bar) and support services (Cleaning, Portering, Building Maintenance and Security).

Exclusions – There are no exclusions to the requirements of the respective standards covered by this manual.

We do hold the following standalone ISO Certificated contracts and services:

- Medirest Kings College Hospital (Re-certified in Sep 2022 for all 3 Standards and due for their Re-Certification Audit in 2026)

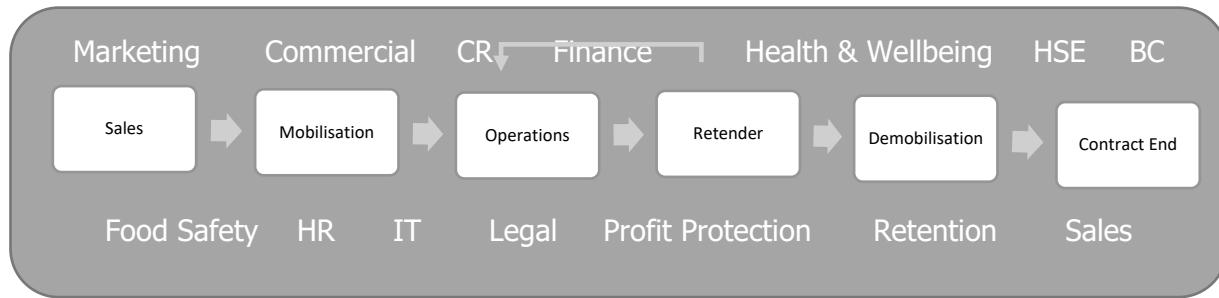
Design and development of products and services is currently not in scope – subject to annual review.

## 4.4 Business Management System (BMS) and its processes

Business Support (Central Functions and sectors) determine the processes needed to support all operations and contracts within the business.

Each contract follows pre-determined processes from tender to operation to contract end – These processes will be determined and implemented by the contract teams.

The relationships and flows are demonstrated within the diagram below:



## 5. Leadership

### 5.1 Leadership and commitment

#### 5.1.1 General

**Accountability:** Robin Mills, Chief Executive Officer, Compass Group UK & Ireland Ltd and executive board ensures that the BMS is compatible with the strategic direction and context of the organisation. Jodi Lea, Director of Legal Services, Compass Group UK & Ireland, & Sophie Smith, Chief People Officer, Compass Group UK & Ireland ensures that BMS responsibilities are assigned, and risks are effectively managed. Gareth Sharpe, Chief Finance Officer, Compass Group UK & Ireland, ensures that the relevant resources are available to deliver the requirements of the integrated management system. Mark Armstrong, Health, Safety and Environment (HSE) Director, Compass Group UK & Ireland, has overall responsibility for the effectiveness of the health, safety, quality and environmental system standards across Compass Group UK & Ireland.

**Policy:** The Food Safety, Health and Safety, Environment and Quality policies establishes Compass' policy in respect of the management of health, safety and environment across UK and Ireland. It has been approved as compatible with the strategic direction and context of the organisation by Robin Mills, MD Compass Group UK & Ireland Ltd (January 2025):

[Compass Policy Statements | Compass HSE](#)

**Deployment:** We adhere to ISO 9001 standard for quality management to ensure food safety, ISO 45001 for Occupational Safety and have a target to maintain ISO 14001 certification for our environmental management system at all Compass Group UK & Ireland sites.

**Process approach and risk-based thinking:** Top management maintains a Major Risk Assessment programme for Compass Group UK & Ireland (reviewed every six months). Risk management is incorporated into policy development, business and strategic planning and review, and change management.

#### Leadership Safety Walks:

As part of our Leadership Commitment to caring for our people and ensuring positive two-way dialogue, our Leadership Teams have committed to carry out Safety Walks across all of our venues. These Safety Walks will be completed by our UK and Ireland Leadership Team and each of the sector Leadership Teams. There is now set KPI's for all relevant parties in CGUKI as a Leading indicator for the 2025/2026 Leadership Bonus Scheme.

**Availability:** The BMS is readily available to all colleagues via the HSE website:

[Business Management System \(BMS\) | Compass HSE](#)

**Communication:** BMS updates are communicated to the HSE team and business leaders via email and Latest News on the HSE website as and when required. Significant changes will also appear on Connect (examples available, e.g. NET Zero Toolkit annual updates).

Mark Armstrong, HSE Director, updates the Compass UK & Ireland Exec Team on a weekly basis as part of their Trading Flash Calls on any significant issues and trends in the business that may need Executive input or leadership.

**Achieving the intended outcomes:** The Compass UK & Ireland Corporate objectives are set annually by Compass Group (Global), Compass UK & Ireland, the objectives are reviewed regularly by top management, sector executives and support directors. Objectives are measured against set criteria and reviewed/amended by top management if required.

**Support:** Compass UK & Ireland supports the core business activities through a number of dedicated support functions that are outlined in the context of the organisation.

**Continual improvement:** Improvement within Compass UK & Ireland is led by the UK & Ireland Executive and sector top management which is used to monitor and promote continual improvement of the Business. A core part of the process is to obtain feedback and continually improve the BMS.

**Other relevant management roles:** Sector, contract and units directors and managers along with Central Functions management deliver the business objectives and targets, in support of the Compass UK & Ireland Executive. Customer focus:

Top management demonstrate leadership and commitment with respect to customer focus by ensuring that:

- a) Contracts are reviewed to ensure that customer and **applicable statutory and regulatory requirements** have been determined, understood and consistently delivered from contract start and at agreed times determined by the client/Compass process;
- b) Contracts are reviewed annually to ensure that **risks and opportunities** that can affect conformity of products and services and the ability to enhance customer satisfaction are determined and addressed (Customer satisfaction is collated under sector/contract agreed processes);
- c) **Client/Customer satisfaction** programmes are conducted to establish the level of satisfaction and determine whether the product/service supplied meets their requirements on an on-going basis, and results used to assist continuous improvement. Site/contract managers are responsible for monitoring and responding to customer comments on their site.

## **5.2 Food Safety, Health & Safety, Environment and Quality Policy**

- Compass Group, UK & Ireland Limited's Food Safety, Health and Safety, Environment and Quality Policies are approved by Robin Mills, MD Compass Group UK & Ireland Ltd;
- They are reviewed annually to ensure they continue to support our business objectives and our customers' expectations (Last reviewed/amended January 2025);

## **5.3 Organisational roles, responsibilities**

Top management ensures that responsibilities and authorities for relevant BMS roles are assigned and communicated throughout the business. Top management structure: <https://www.compass-group.co.uk/meet-the-family/our-people-and-culture/our-executive-team/>;

- Mark Armstrong, HSE Director, has been assigned overall responsibility for the effectiveness of the health, safety, quality and environmental system standards across Compass Group UK & Ireland;
- Mark Armstrong, HSE Director, is also responsible for reporting on the performance of the BMS and on opportunities for improvement to top management, UK&I Sustainability Team and the global Compass Group PLC Safety and Sustainability Team;

The Compass HSE Department provides direct support and guidance to the business. The HSE Department structure is available: [Meet the HSE Team | Compass HSE](#)

- Mark Armstrong, HSE Director, Compass Group UK & Ireland, is accountable for implementing and maintaining the BMS across Compass Group UK & Ireland and ensuring it conforms to ISO 9001:2015 and ISO 45001:2018 standards;
- Ashleigh Taylor, Head of Environment, Compass Group UK & Ireland, is accountable for implementing and maintaining the EMS (environmental management system) across Compass Group UK & Ireland and ensuring it conforms to ISO 14001:2015;
- Ashleigh Taylor, Head of Environment, is also responsible for reporting on the performance of the EMS and on opportunities for improvement to top management, UK&I Sustainability Team and the global Compass Group PLC Safety and Sustainability Team;
- Carolyn Ball, Director for Delivery of Net Zero, in Compass Group UK & Ireland, is responsible for delivering our Net Zero Ambitions as outlined in our Net Zero Charter and Roadmap.
- Simon Chattock, Head of Vendor Assurance, Compass Group UK & Ireland, is responsible for ensuring that all suppliers and their products comply with legal requirements and Compass purchasing standards;
- Nick Bracken, Operational Risk and Safety Project Manager, Compass Group UK & Ireland, is responsible for driving and delivering the strategic business continuity agenda for the business;
- **Internal communication:** HSE responsibilities at all levels of the organisation are communicated to the business on the HSE website: Home > Management Systems > Plan > HSE Responsibilities: [R | Compass HSE](#)
- **External communication:** Compass Group communicate externally via our UK Comms Team on new business, awards, management changes and any proactive business impacts such as our Net Zero Goals.

## 6. Planning

### 6.1 Actions to address risks and opportunities

#### 6.1.1 General

Risks and opportunities are addressed within the following documents:

| Document Name                  | Document Owner                                  | Monitor and Review |
|--------------------------------|-------------------------------------------------|--------------------|
| Major Risk Assessment (MRA)    | UK&I Exec                                       | Reviewed Annually  |
| Environmental Aspects Register | Head of Environment, Compass Group UK & Ireland | Reviewed Annually  |

The above table covers high level risks for Compass UK & Ireland. Risks and opportunities are also controlled and managed within the Compass UK & Ireland sectors listed in 4.1.

### 6.1.2 Environmental aspects

The **Environmental Aspects Register** identifies our activities at company and unit level and assesses their impact on the environment, both positive and negative. It evaluates how much effect our activities have and details how these effects can be controlled and mitigated.

Environmental Aspects Register (MS Excel) (Last updated: November 2025 (annually))

Environmental Aspects and Impacts are identified at unit-level using the NET Zero Toolkit.

The ISO 14001 Environmental Management System (EMS) is implemented at unit-level using the **Net Zero Toolkit**. The Net Zero Toolkit is a straight-forward and easy to complete booklet divided into six focus areas: Climate, Biodiversity, Deforestation, Waste, Plastics & Packaging and Water & Pollution.

It ensures compliance, as well as providing opportunities to work smarter. The Toolkit is mandatory for all sites to complete within six months from contract start and will last for two years, subject to annual reviews.

The Net Zero Toolkit is supplemented by the following resources:

- **Food waste** – Dedicated [webpage](#) on the Net Zero Hub outlining our approach to minimising food waste, which includes, prevention; to reduce the amount of food waste that goes unsold/uneaten, recovery; to donate surplus food to people in need, and recycling; to divert food waste from sewer and landfill. Resources include a Food Waste Strategy, Team Briefs, and Surplus Food Donation Guide.
- **Single-use plastics** – Dedicated [webpage](#) on the NET Zero Hub with links to a Single-Use Plastics Guide, Action Plan and Posters. Now fully banned across UK and Ireland.
- **Greenhouse gas emissions** – CGUKI had the following absolute emissions reduction targets, as validated by the SBTi in 2021.
  1. To reduce absolute Scope1 and 2 greenhouse gas emissions 69% by 2030 from a 2019 base year.
  2. To reduce absolute Scope 3 GHG emissions from purchased goods and services 69% by 2030 from a 2019 base year.

We are also aware of the now-confirmed (as of 28th September 2022) FLAG sector guidance from the SBTi which applies to Compass and which calls for:

Reduction of emissions from forestry, land use and agriculture (FLAG) by 72% by 2030.

Reduction of all non-FLAG emissions by 90% by 2030.

We will revalidate our targets in line with this new guidance.

- **Plant-forward meals** – CGUKI have undertaken 12-months' R&D into carbon accountancy and footprinting capability. We now have a long-term partnership with Foodsteps in the development of a robust approach to carbon accountancy.
- **Sustainability Reporting** – Our commitments to the wider sustainability agenda across all Compass Group UK & Ireland operations are outlined in our Sustainability Report. Progress is shared within our annual Climate Impact Report. (Last published February 2023). We now have in place our Transition Plan (Beyond the Bottom Line) from 28<sup>th</sup> February 2024 shared and backed by the UK Government's Final Disclosure Framework the first for a food service provider in the UK.

**Achievements to date from our sustainability reporting include:**

- -9.4% absolute reduction in emissions inclusive of 20% business growth (FY19 baseline – FY23, Scope 1,2,3).
- -25% reduction in carbon intensity
- -162,828 tCO2e reduction in emissions attributed to purchases of food and drink.
- 1 in 4 recipes analysed now rated as "low carbon impact" (A and B rated) as part of a wider project to reduce the footprint of 214mn meals served annually.
- 185,000 meals donated to charities in past 12 months, contributing to a total of 1mn meals redistributed via FareShare since 2014.
- Three quarters of a million litres of cooking oil converted into biofuels.
- 31 tonnes of cling film saved - the equivalent of over 5,200 miles – it could stretch from the UK to USA.
- Removed almost 50mn pieces of cutlery, 6.3mn plastic bottles, 1.4mn cans, and 3.9mn sachets.
- Recipe reformulation >90% of its recipes now containing low to medium amounts of sugar and salt.

### **6.1.3 Compliance obligations**

#### ***Environment***

A Legal Compliance Register is maintained detailing all environmental legislation and other requirements applicable to our business and allows us to monitor compliance to ensure we operate within the law and avoid environmental incidents. The legislation covers:

- Air emissions
- Ecology (wildlife and habitats)
- Hazardous substances
- Land pollution
- Planning and building
- Pollution control
- Statutory nuisances
- Waste management
- Water management
- Other requirements
- Sustainable development

The Register is reviewed and updated on an annual basis by our internal Head of Environment. The Head of Environment will advise the business of relevant changes, which may result in changes to environmental policies and procedures to ensure that they remain appropriate.

Legal Compliance Register is now held on Barbour Legal Register (for reference only). Last updated: December 2025. (updated annually basis)

Units should ensure compliance with environmental legislation by completing the Controls sections of the **NET Zero Toolkit**.

### **Health and Safety**

A Health and Safety Legal Register is maintained detailing relevant health and safety legislation. The Register is held on our HSE Website and is being transferred over to Barbour Legal Register, it is reviewed and updated annually and as new legislation is released.

### **Food Safety**

A Food Safety Legal Register is maintained detailing relevant food safety legislation. The Register is held on our HSE Website and is being transferred over to Barbour Legal Register, it is reviewed and updated annually and as new legislation is released.

## **6.2 Planning action**

Actions to address our significant environmental aspects, compliance obligations, and risks and opportunities, and the effectiveness of these actions, are contained within the Environmental Aspects Register and Legal Compliance Register.

## **6.3 Objectives and planning to achieve them**

Objectives and Targets are established, communicated and monitored at company level.

## **6.4 Planning of changes**

Updates to HSE and BC are carried out in a planned manner and recorded within the following documents locations:

| Document Name             | Document Owner   | Monitor and Review |
|---------------------------|------------------|--------------------|
| Document Control Register | HSE Website Team | Ongoing            |

Planning of changes within support functions/sectors are recorded under their processes and systems.

## **7. Support**

### **7.1 Resources**

Resources required for the maintenance and continual improvement of the BMS:

| Resources                                   | Capabilities                                                                                                                                                                                         | Constraints                                                          |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| <u>Connect HSE Business Support Page</u>    | Internal - Provides access to the HSE website, AIR, Latest News, and provides links to latest BMS tools and programmes                                                                               | Limited ability to store and retain documents long term              |
| <u>HSE website</u>                          | Internal - Central point for sharing electronic BMS documentation and procedures, tool for communicating the BMS to the business, including changes in 'Latest News'                                 | Basic functionality and design, updated internally by the HSE team   |
| <u>AIR3 - All Incident Reporting System</u> | Internal - Online system for reporting accidents, near misses, environment incidents, alleged food poisoning, food allergy, foreign bodies, reporting enforcement contact and completing HSEQ audits | Separate login to Compass system                                     |
| Origami Mobile App                          | Mobile auditing app, linked to AIR3. Allows our Operational Teams to conduct a variety of audits                                                                                                     | Secure Passcodes for each sector, Ensuring Users review the guidance |

|                                                                    |                                                                                                                                                                                                                                                                                                                              |                                                                                                                |
|--------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
|                                                                    | within their business to support efficient service delivery and safety management                                                                                                                                                                                                                                            | documents and videos to implement the audits correctly                                                         |
| <a href="#">Net Zero Hub</a>                                       | Internal - Central point for sharing environmental information and guidance                                                                                                                                                                                                                                                  | Updated internally by the Learning and Development Team. New platform meaning new content development required |
| Linney My Store                                                    | External - Central point for ordering hard copies of BMS documentation, including toolkits, labels, and signs                                                                                                                                                                                                                | HSE team required to maintain stock levels                                                                     |
| <a href="#">Meet the HSE Team</a><br><a href="#">  Compass HSE</a> | Persons necessary for the effective implementation, operation and control of the BMS (Please also refer to <a href="#">Section 5.3 Organisational roles, responsibilities and authorities</a> within this document)                                                                                                          | None at this time                                                                                              |
| People                                                             | Internal: Online system for all recruitment and colleague management HR Portal supported by Compass UK&I HR central team this is in respect of persons necessary for the effective implementation, operation and control of the business<br><br>Constellation is Compass UK new internal staffing agency for temporary staff | None at this time                                                                                              |
| Equipment                                                          | Internal: All equipment used and necessary for the operation of Compass business processes and to achieve conformity of delivery e.g. IT equipment, vehicles, and stationery                                                                                                                                                 | None at this time                                                                                              |
| Suppliers and contractors                                          | Internal/External: All suppliers and contractors must comply with Compass' moral, contractual and reputational obligations. A supplier is only deemed compliant to the Companies process if compliance is achieved at both Corporate and In-Unit level.                                                                      | All supplier and contractor areas are controlled by Foodbuy                                                    |
| Foodbuy Online System                                              | Available to all unit teams via Connect so they can order supplies, check off goods in deliveries live on the system and reject or request credit notes for faulty or non-delivered goods. In addition, all complaints and issues can be logged via the Foodbuy Online Helpdesk System                                       | None at this time                                                                                              |
| Infrastructure: Head offices and central functions departments     | Infrastructure necessary for the operation of processes and to achieve conformity of products and services, e.g. buildings and associated utilities, equipment, transportation, and IT                                                                                                                                       | None at this time                                                                                              |
| Brakes warehouses and transportation (food and non-food)           | External - Brakes maintain suitable physical environments for ambient, chilled and frozen foods during storage and delivery. Brakes hold BRC storage and distribution standards for all of their warehouses (third party assessed)                                                                                           | None at this time                                                                                              |
| Bunzl warehouses and transportation (disposables and PPE)          | External - Bunzl maintain suitable physical environments for storage and delivery of disposables and PPE                                                                                                                                                                                                                     | None at this time                                                                                              |
| Monitoring and measuring: In-unit                                  | Temperature probes and scales are used to verify the conformity of products and services – Video on HSE website and Connect on how to calibrate                                                                                                                                                                              | None at this time                                                                                              |

|                                    |                                                                                                                                                                                                                                      |                   |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| Calibration of measuring equipment | Compass use their own temperature probes                                                                                                                                                                                             | None at this time |
| Traceability                       | General food law requires that food products must be traceable, suppliers are able to trace products through the supply chain if provided with the batch code, best before or use by date that is distributed on the product labels. | None at this time |

## 7.2 Competence

The Compass UK & Ireland sectors work closely with Learning and Development (L&D) to determine the necessary competence of all colleagues on the basis of appropriate training/skills development and competency assessment.

Compass training is available here: <https://www.mylearningatcompass.co.uk/index.php>

Training record cards must be kept up to date as evidence of competence.

## 7.3 Awareness

Compass UK & Ireland ensure colleagues remain aware of the BMS system requirements through the following means:

| Internal Resources                                                           | How colleagues are made aware                                                                                                                                                                                                                                                                                                                                                    | Monitor and Review        |
|------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| Food Safety, Health & Safety, Environment and Quality Policy                 | All units are required to have the latest version available                                                                                                                                                                                                                                                                                                                      | Annually – Every January  |
| HSEQ Objectives: Corporate                                                   | Published on the HSE website: <a href="#">HSE Objectives   Compass HSE</a>                                                                                                                                                                                                                                                                                                       | Annually – Every October  |
| HSEQ Objectives: Unit-level                                                  | Published on the HSE website: <a href="#">HSE Objectives   Compass HSE</a>                                                                                                                                                                                                                                                                                                       | Annually – Every October  |
| Environmental Objectives: Unit-level                                         | Units set their own environmental objectives as part of the continual completion of the Climate Net Zero Toolkit <a href="https://www.mylearningatcompass.co.uk/otara/dashboard/index.php?id=142">https://www.mylearningatcompass.co.uk/otara/dashboard/index.php?id=142</a><br>It is within the Toolkit that units identify applicable aspects and how to reduce their impacts. | Annually – Every October  |
| Contributing to the effectiveness of the BMS: Internal performance reporting | Published on the HSE website                                                                                                                                                                                                                                                                                                                                                     | Annually – Every December |

## 7.4 Communication

Communication methods used internally are as follows: Examples of communication are:

| Internal Comms                  | Method                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Owner                                                                       | Monitor and Review                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Communications procedure        | <p>In line with the Business Code of Contact, and the relevant HR policies, Compass has clear communication processes and channels. Central internal communications and all medical relations are managed by the UK communications team as it's our central social medical platform.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | UK Communications                                                           | As and when required                                                                                                                                                                                                                                                                                                                                                                                                          |
| Crisis Communications Procedure | <p><b>Crisis Management Guide for Managers</b>, this was last reviewed in December 2024. The guide is primarily about ensuring safety and welfare. It gives our colleagues on the frontline a reference document to be able to enable them to get help when they need it the most.</p> <p>The guide is for the more serious incidents, for example, multiple work related injuries, a high impact food quality issue, product recalls, extreme weather incident and terrorist attacks.</p> <p>Clearly these type of incidents are above and beyond what can be coped with at a unit and sector level. Lower level incidents are dealt with at a local level utilising the Unit Managers Emergency Manual Re-issued to all sites in July 2022</p> <p>We have also set up the <b>Compass Crisis Line</b>. This dedicated free phone number which is manned on a 24/7 basis. We have partnered with a major contact centre (based in Liverpool) Any of our operational colleagues can call this number to mobilise our central crisis management team who can then deploy our central resources and subject matter experts to resolve the crisis.</p> | Nick Bracken, Operational Risk & Safety Manager, Compass Group UK & Ireland | <p>Plan is reviewed annually and updated whenever there is a material change to Crisis Management Team personnel or processes.</p> <p>All calls to the Crisis Line are reviewed centrally and the learning outcomes are shared with the affected operational teams.</p> <p>Review and Update with Crisis Management Line on April 2025 by Mark Armstrong and Nick Bracken to include the HSE Team to support Out of Hours</p> |

|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                         |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
|                          | <p><b>Alert Media Crisis Communications System:</b></p> <p>We now have a new Crisis Communications Partner, Alert Media who are the leading global provider of SaaS-based unified critical communications solutions.</p> <p>The System allows our Crisis Management Team to quickly and easily communicate with our senior management teams across the business using multiple channels (work &amp; personal emails, mobiles, landlines) before, during and after a Crisis.</p> <p>Head Offices:</p> <p>The Crisis Communication System includes all staff at all our head offices across the UK and Ireland (4 head offices). This allows our head office Incident Management Teams to quickly and easily communicate with all head office staff in an emergency. Instances where the system may be used include:</p> <ul style="list-style-type: none"> <li>• Fire evacuations</li> <li>• Security Incidents</li> <li>• Building closures</li> <li>• Major IT failures</li> <li>• Major traffic incidents in the head office area.</li> <li>• Extreme weather incidents</li> </ul> |                         |
| Corporate communications | Business communications such as financial updates and the annual report are managed by the Compass Group PLC communications team rather than the UK & Ireland team.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Compass Group PLC comms |
| Issues Management        | All media issues are managed by the UK communications team in line with the company's media policy and the Group's business code of conduct. A dedicated number is in place to handle such queries.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | UK Comms                |

|                                    |                                                                                                                                                                                                                                                                                                               |          |                                                                         |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-------------------------------------------------------------------------|
| Compass Connect – News             | Articles of interest to the business are posted on the Compass Connect News carousel e.g. product launches, awards, new business, etc.                                                                                                                                                                        | UK Comms | As and when required<br><br><i>*To be replaced by Work Jam in 2026*</i> |
| Compass Workplace by Facebook      | Social collaboration platform where colleagues can share ideas, news, and best practice. This is through open forums, closed and secret groups as appropriate.<br><br>HSE also promote a Monthly Safety Moment via Workplace.<br><br>Key Learnings from Incident also posted via Workplace by Mark Armstrong. | UK Comms | As and when required                                                    |
| UK Comms Weekly Business Update    | Topics of focus for that week are shared with all units via an emailed Weekly update on a Monday morning, This includes Compass Group UK & I focuses and also sector specific focuses                                                                                                                         | UK Comms | Weekly                                                                  |
| UK Comms Monthly Business Update   | Articles of interest are featured monthly colleague magazine. This has a dedicated people section.                                                                                                                                                                                                            | UK Comms | Monthly                                                                 |
| See Care Share Monthly Unit Update | A monthly update to include a review of HSE Incidents in the previous month along with our Top 3 Incident Trend. A Safety Focus and Safety Moment for the month and relevant Reminders or Updates including a "Take Home" Safety Topic                                                                        | HSE Team | Monthly (also hosted on HSE Website under "See Care Share")             |
| Email Updates                      | BMS and environment updates are communicated to the HSE team and business leaders via email, e.g. lessons learnt, safety shouts, guidance notes, etc.                                                                                                                                                         | HSE Team | As and when required                                                    |
| HSE website – Latest news          | BMS and environment updates are communicated to the HSE team and business leaders via Latest News on the HSE website                                                                                                                                                                                          | HSE Team | As and when required                                                    |

### Communication methods used externally are as follows:

| External Comms     | Method                                                                  | Owner                                                   | Monitor and Review |
|--------------------|-------------------------------------------------------------------------|---------------------------------------------------------|--------------------|
| Client bid content | Maintenance of bid content within the Proposal Development Centre (PDC) | Bid and Content Manager<br>Compass Group UK and Ireland | Ongoing            |

|                                                          |                                                                                                                                                                                         |                                           |                                   |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|-----------------------------------|
| UK&I Performance                                         | Published on the Compass Group UK & Ireland external website:<br><a href="https://www.compass-group.co.uk/responsibility/">https://www.compass-group.co.uk/responsibility/</a>          | Sustainability Team, Compass Group UK&I   | Annually – Every December/January |
| Global Performance                                       | Published on the Compass Group Plc external website:<br><a href="https://www.compass-group.com/en/acting-responsibly.html">https://www.compass-group.com/en/acting-responsibly.html</a> | Sustainability Team, Compass Group PLC    | Annually – Every December         |
| Environmental Health Officers/ Local Councils            | The HSE Managers communicate on behalf of the business                                                                                                                                  | HSE Team                                  | As and when required              |
| Primary Authority Partnership with Luton Borough Council | Quarterly Review Meeting and Regular Contact as required including significant legislative updates                                                                                      | HSE Team with Rob Clapham and Zoe Hammett | Quarterly                         |
| Interested individuals/groups/ Complaints                | Queries and complaints are directed to and dealt with by the UK Comms Team                                                                                                              | UK Comms                                  | As and when required              |

## 7.5 Health and Wellbeing

The Health and Wellbeing of our colleagues, clients and partners is very important to Compass Group UK and Ireland. As such we have launched a Health and Wellbeing website called Nourished Life ([www.nourishedlife.co.uk](http://www.nourishedlife.co.uk)) . This website is available to all of our colleagues, clients and partners. It contains healthy eating recipes, mental wellbeing activities, physical activities and expert advice from our in-house nutritionists and external partners in Sleep, Fitness and Exercise.

**AXA Be Supported:** This is our employee assistance programme, it is an independent, impartial advice service that can be accessed online, providing easy, fast and confidential access to information and resources on a wide range of work-related or domestic topics. The information is presented in a way that is both easy to access and understand. There is also a confidential phone number that operates 24/7, 365 days a year and gives our colleagues the opportunity to discuss any concerns they may have.

**YOU MATTER:** Compass 'YOU MATTER' Programme Launched in October 2020 across the business.

As part of the You Matter Network all operational parts of the company have access to resources and a network of Ambassadors who will be a source of information and will drive wellbeing within the company. The You Matter Network is in place to drive awareness and to provide frontline teams with and sources for company information on EAP and Mental Health First Aid. In 2025 the Network introduced 8 Managers Guides on a range of topics to support our colleagues in a variety of situations including Anxiety, Depression and Bereavement.

**KITT MEDICAL:** A new initiative in our Levy business to ensure we have Occupational Health Provision for all our team members who suffer from allergies. We have partnered with Kitt Medical to install Anaphylaxis Kits in all of our Venues across Levy UK. The Kits provide adrenaline pens for use by our team members, there is CPD training on their use and the pens are replaced annually to ensure they are always in date and within 48 hours should they need to be used. [www.kittmedical.com](http://www.kittmedical.com)

## 7.6 Documented information

Documentation and its processes in relation to the BMS are available for use on the HSE website: [Home | Compass HSE](#)

When creating and updating documented information, the document owners ensure an appropriate title, date and version number is provided.

BMS documentation and changes are captured within the following documents:

| Document Name             | Document Owner   | Monitor and Review |
|---------------------------|------------------|--------------------|
| Document Control Register | HSE Website Team | Ongoing            |

## 8. Operation

### 8.1 Operational planning and control

Processes needed to implement, control and maintain the BMS can be found here:

| BMS Section                                                        | Link to HSE website                                                                                                        | Owner                                                                                                                                   |
|--------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| <b>ISO 9001:2015 – Quality Management</b>                          | Food safety: <a href="#">Food Safety   Compass HSE</a><br>Vendor assurance: <a href="#">Vendor Assurance   Compass HSE</a> | Mark Armstrong,<br>HSE Director, Compass Group UK & Ireland.<br>Simon Chattock,<br>Head of Vendor Assurance, Compass Group UK & Ireland |
| <b>ISO 14001:2015 – Environmental Management</b>                   | <a href="#">Environment   Compass HSE</a>                                                                                  | Ashleigh Taylor,<br>Head of Environment, Compass Group UK & Ireland                                                                     |
| <b>ISO: 45001:2018 – Occupational Health and Safety Management</b> | <a href="#">Workplace Safety Management System   Compass HSE</a>                                                           | Mark Armstrong,<br>HSE Director, Compass Group UK & Ireland                                                                             |

#### 8.1.1 Life Cycle Perspective

A range of documentation is used internally to ensure that environmental requirements have been carefully considered at the life cycle stages under Compass' control or influence for all products and services.

Documents to ensure that environmental requirements have been considered in the design and development stages may include:

- Request for Information
- Request for Proposal
- Sourcing Standards
- Code of Business Conduct
- Services Letter of Appointment

These documents are owned and managed by Foodbuy, with the exception of IT (separate function). They are developed when needed and made relevant to the product or service being procured. Environmental requirements are specified in liaison with the UK and I Sustainability Team.

Once suppliers and their products or services have been approved through the formal process, the Vendor Assurance and HSE teams can request further information as part of

their checks (see section 8.4). This may include documents or service provisions for specific products that are required to comply with regulations, such as COSHH or WEEE.

The transport impacts from the delivery of products to sites are minimised by utilising our efficient logistics network. Our partnership with Bunzl has enabled us to improve the efficiency of our logistics operations by allowing other non-food suppliers to utilise their national distribution network when delivering to us. The majority of our fresh produce, dairy, grocery and meat is delivered to us by one logistics partner, Brakes, which helps to reduce food miles and carbon emissions. Multi-temperature vehicles further reduce the number of deliveries.

In addition, The Transport the Climate section of the Climate Net Zero Toolkit encourages sites to make deliveries as efficient as possible by buying through Bunzl/Brakes, planning ahead, ordering in bulk, and carefully managing how often we deliver to Compass sites. It also prompts them to encourage delivery drivers and contractors to secure their vehicles and switch off their engines whilst stationary on site.

When products reach their end of life, the Waste section of the Climate Net Zero Toolkit provides comprehensive information on how to separate non-hazardous, organic and hazardous waste streams, how they should be stored, and assists with arranging collections for onward reuse, recycling, other recovery and treatment or disposal.

### **8.1.2 Emergency preparedness and response**

| <b>Document/Area Name</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Document/ Area Owner</b>                                                 | <b>Monitor and Review</b>                                                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Unit Managers Emergency Manual</b><br><br>Each of Unit Managers have a comprehensive emergency manual which gives clear guidance on our emergency procedures and what to do in the case of a wide range of incidents which can be managed on a local basis. For example: <ul style="list-style-type: none"><li>• First Aid Incidents</li><li>• Pest Infestations</li><li>• Sewage Contamination of Food Rooms</li><li>• Refrigerator or Freezer Breakdown</li><li>• Water Supply Failure or No/Inadequate Hot Water Supply</li></ul> | Nick Bracken, Operational Risk & Safety Manager, Compass Group UK & Ireland | Version 3 July 2022 has now been re-issued to all units and available on HSE Website.<br><br>This is currently under review for first quarter of 2026. |
| <b>Crisis Management Team:</b><br><br>The Crisis Management Team (CMT) is a small team of six senior staff representing the key operational areas of the business, so they can operate                                                                                                                                                                                                                                                                                                                                                  | Nick Bracken, Operational Risk & Safety Manager, Compass Group UK & Ireland | The Crisis Management Plan is reviewed annually and updated whenever there is a material                                                               |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                            |                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>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.</p> <p>Each member of the Crisis Management Team will have a designated alternate and can be contacted using the Alert Media communication system.</p> |                                                                                            | <p>change to Crisis Management Team personnel or processes.</p> <p>Updated December 2024, reviewed December 2025, no updates required.</p>                                                                                                                          |
| <p><b>Business Continuity Plans:</b> Our head office and central functions are supported by comprehensive business continuity plans. We have an Incident Management team at each of our key locations. Priority is given to maintaining our critical support activities such as IT, Payroll, Finance and HR</p>                                                                                                                                                                                                           | <p>Nick Bracken, Operational Risk &amp; Safety Manager, Compass Group UK &amp; Ireland</p> | <p>Business Continuity Plan Policy reviewed December 2025, no updates required.</p>                                                                                                                                                                                 |
| <p><b>IT Disaster Recovery Plan</b></p> <p>SAP in the Cloud represents the biggest transformational change to Compass IT infrastructure for 10 years and is central to enabling our business strategy.</p> <p>Our core SAP, HR and Payroll systems have now been migrated into the Amazon Cloud.</p>                                                                                                                                                                                                                      | <p>Nick Bracken, Operational Risk &amp; Safety Manager, Compass Group UK &amp; Ireland</p> | <p>Annual testing</p> <p>On 16/09/25 a Disaster Recovery Test of our core SAP, HR and Payroll systems was facilitated. All systems were fully restored within 2 hours and the Recovery Point Objective (maximum acceptable data loss) was less than 15 minutes</p>  |
| <p><b>Counter Terrorism Training</b></p> <p>Compass Group work closely with the National Counter Terrorism Security Office (NaCTS) to deliver a comprehensive training and awareness programme to keep our people safe and to</p>                                                                                                                                                                                                                                                                                         | <p>Tim Isaac, Security Manager, Compass Group UK &amp; Ireland</p>                         | <p>Annual Review</p> <p>The material is under constant review and is updated as soon as NaCTS produce an updated version of the training material. In any case it is reviewed annually.</p> <p>We are currently reviewing the new Martyn's Law legislation, via</p> |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>promote the key counter terror messages.</p> <p>Compass Group achieved a notable success at the 2018 Counter Terror Awards at Olympia on the 6<sup>th</sup> March 2018.</p> <p>The Counter Terror Awards recognise the efforts of organisations in both the public and private sectors and their contributions to counter terror strategy in the UK and overseas.</p> <p>Compass Group were commended in the Counter Terrorism Project Category in recognition of their effective counter terrorism strategy and awareness campaign.</p> |                                                | <p>Tim Isaacs our Head of Security to ensure those locations that fall under the legislation are being advised and guided effectively. The new legislation Terrorism Protection of Premises Act 2025 has been added to the H&amp;S Legal Register.</p>                                                                                                                                                                                                                            |
| <p><b>Human Trafficking and Modern Slavery Training</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>Foodbuy</p>                                 | <p>Training provided to all managers within the Venues Collection contracts. So they are able to recognise the signs of trafficking and react to a suspected incident at any of our Venues Collection locations.</p> <p>Foodbuy team have received training on the risks within Supply Chains</p> <p>Foodbuy are now part of the Human Rights Working Group led by Compass Group and used for the sharing of information and best practice in terms of current global issues.</p> |
| <p><b>Code of Business Conduct</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Compass Group Ethics and Integrity Team</p> | <p>All compass employees now have to complete the Code of Business Conduct training via our Learning and Development Platform and all Business Leaders must sign a declaration of Ethics and Integrity annually.</p>                                                                                                                                                                                                                                                              |

## 8.2 Requirements for products and services

| Clause                                                        | Dept.                          | Responsibilities                                                                                                                                                                                                                                                              |
|---------------------------------------------------------------|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8.2.1. Customer/client communication                          | Customer Excellence Team (CET) | Providing information relating to products and services; handling enquiries, contracts or orders, including changes; obtaining customer feedback relating to products and services, including customer complaints; establishing specific requirements for contingency actions |
| 8.2.2. Determining the requirements for products and services | Foodbuy Team                   | Defining the requirements for products and services within the RFI, RFP, and supply chain standards sent to suppliers                                                                                                                                                         |
| 8.2.3. Review of the requirements for products and services   | Foodbuy Team                   | Conducting a category review and formal tender process to review of products and services before committing to supply                                                                                                                                                         |
| 8.2.4. Changes to requirements for products and services      | Foodbuy Comms Team             | Ensuring that relevant documented information is amended, and that relevant persons are made aware of the changed requirements, when the requirements for products and services are changed.                                                                                  |

## 8.3 Design and development of products and services

Currently not in scope - Subject to annual review.

## 8.4 Control of externally provided processes, products and services

The Foodbuy and Vendor Assurance team work together to agree the suppliers for use within the contracts. Foodbuy propose suppliers through their six stage sourcing program and units can also request new suppliers by contacting the Foodbuy support line and submitting an AVL form. The vendor assurance team check to see if suppliers are already approved according to the vendor assurance business rules. Approved Vendor Lists are maintained to ensure that vendors of items used by Compass Group, UK and Ireland Limited have been formally approved.

### ***Food suppliers***

If a proposed food supplier is new to Compass, Vendor Assurance send them a set of supplier questionnaires which gather details about their company procedures as well as their environmental and corporate responsibility standards.

The questionnaires are assessed by the UKAS accredited third party auditing company, NSF international, and the suppliers are categorised into high, medium or low risk.

High and medium risk companies and low risk without a suitable third party accreditation are then audited by NSF international against the Compass auditing standards before they can be approved for use.

High risk suppliers are re-audited every year, medium risk every two years and low risk (without suitable third party accreditations) every three years.

Compass have a team of NSF International and Compass employed technologists who work within the food distribution chain. They inspect products within the distribution depots

against product specifications, they analyse and investigate any quality complaints, trends or issues raised by the units and they are empowered to visit units to investigate and follow the complaint back through distribution to the suppliers and conduct root cause analysis to prevent reoccurrence. The NSF team also take samples from the supply chain to send to UKAS accredited laboratories for Species, micro and chemical analysis to confirm that the products supplied meet the agreed product specifications.

#### ***Non-food suppliers/contractors***

If a proposed non-food supplier/contractor is new to Compass, Vendor assurance send them a non-food questionnaire which gathers company details as well as third party accreditations and insurance details. The questionnaires are assessed by the vendor assurance team and classified into high, medium, low risk and no risk categories depending on the work being done by the supplier.

High risk companies include contractors who conduct construction work on site according to the CIS scheme. For these Compass require a suitable third party SSiP HSE accreditation such as Safe Contractor or CHAS.

Low and no risk categories do not come to Compass sites, so assessment is determined by the product or service provided and assessed on a case by case basis.

#### ***Control of Contractors***

The sub-contractor management process is co-ordinated and managed by a combination of central procurement activities plus essential site specific selection criteria, and sub-contractor engagement, allowing Compass Group UK & Ireland to manage the health and safety risks associated with the employment of contractors in the workplace.

To find out more, open or download the **full Guidance here**.

#### ***External Guidance***

Health and Safety Executive Guidance: [Managing Contractors](#).

#### ***Authority to Work***

The Compass UK&I Authority to Work (ATW) process is a formal written procedure used to control works conducted by contractors and third parties that have been identified as requiring operational controls.

#### ***Additional information:***

[Authority to Work Procedure](#)

[Authority to Work Flow Chart](#)

[10 Point Works Approval Checklist](#)

[Monitoring Checklist](#)

[Contractors Passport](#)

## **8.5 Production and service provision**

Where a branded external food offer is served, production and service provision will meet the "brand standard" as detailed in the relevant brand operating manual (e.g. Costa, Starbucks, Subway, Marks and Spencer, etc.).

Steamplicity, Manufacturing and Central Production Units (CPU) hold separate certification – Standalones (BRC accreditation; St Albans exp 8<sup>th</sup> November 2025, St Helens exp 28<sup>th</sup> October 2025, each has achieved AA+ Grade, EC-853 Licensed Premises for all other CPU locations).

## **8.6 Release of products and services**

All products and services are subject to checks and testing where applicable prior to release to clients and customers, these checks and tests are recorded in line with the relevant product/service. This includes:

- Internal checks: i.e. pre service checks, temperature recording, visual inspection, equipment checks, cleaning records.
- External checks: i.e. local authority EHO visits, client audits.

## **8.7 Control of non-conforming outputs**

### ***Supply chain***

Supply chain quality non-conformances are initially reported to the supplier concerned for corrective action directly by the units. If a suitable response is not received or a credit is required then the units contact the Foodbuy Customer Excellence Team (CET). The FSL team log all calls and emails and contact the supplier or relevant category development manager to manage the issue to a suitable conclusion.

Quarterly Review with Brakes on SLA between Compass UK and Ireland and Brakes in relation to the Quality of the food provision and shortages and any other relevant impacts on our supply chain and delivery to units.

Trends on quality non-conformances are analysed each month and the activities of our NSF QA team directed accordingly.

Foreign body complaints are logged by units on the AIR computer system, they are investigated by Vendor assurance and if the cause is supplier related a response on corrective action is provided to customers by the supplier. In-unit foreign body complaints are managed by the unit manager and HSE team. Trends are analysed and followed up with the supplier.

All services/goods found to be non-conforming are either:

- Segregated (quarantined) and clearly identified; or
- Non-conforming services when identified are resolved at the appropriate level (i.e. site, contract, region, sector).

The unit manager (or delegate) in conjunction with the Foodbuy CET, where applicable, is responsible for the processing of all non-conforming materials held in quarantine.

Non-conforming services (e.g. employees not following the correct procedure) are corrected as quickly as is practical and may be detailed on a Non-Conformance Report if appropriate. Environmental incidents (e.g. oil spillages), Incidents, near misses are reported on the online AIR system.

Customer complaints are dealt with according to Customer Feedback Procedure and Foreign Body/Alleged Food Poisoning, Food Allergy Procedures or Food Quality Complaints, there are recorded, analysed and appropriate action taken to prevent re occurrence.

On occasions non-conforming products may still be acceptable to the client customer. If this is thought to be the case the customer will be informed and a concession sought.

## **9. Performance evaluation**

### **9.1 Monitoring, measurement, analysis and evaluation**

#### **9.1.1 General**

The Company carry out auditing at sites on a regular basis throughout the year to ensure compliance with the management systems.

Auditing frequency and selection of units is determined within each sector on a yearly basis. Auditing is then carried out in line with the ISO Standards.

There are three levels of auditing which are undertaken through the year:

- 1<sup>st</sup> Tier: HSE Quarterly Record
- 2<sup>nd</sup> Tier: Internal Audit Programme
- 3<sup>rd</sup> Tier: Independent External Audits

#### **9.1.2 Customer satisfaction**

Customer feedback is actively sought at each site/contract. Completed documents are retained. Any areas of improvement are identified and investigated. Our customer/clients are periodically provided with customer/client feedback opportunities which, when completed and returned, provide valuable information and input regarding their assessment of our service. Statistical techniques are used in the measurement of customer/client satisfaction levels.

#### **9.1.3 Analysis and evaluation**

Compass data from monitoring and measurement is utilised to support improvements and the development of objectives within the organisation: [Continuous Improvement | Compass HSE](#)

## **9.2 Internal audit**

To continually improve the quality of our businesses we use the ISO 9001:2015 international quality standards as the basis of our management system. This provides a framework for Compass Group to control its processes in order to achieve our objectives, including customer satisfaction, regulatory compliance and continual improvement.

### *1<sup>st</sup> Tier Auditing: HSE Quarterly Record*

The Unit Manager will complete an HSE Quarterly Record covering four key areas: Health & Safety, Food Safety, Environment, and Quality.

### *2<sup>nd</sup> Tier Auditing: Internal Audit Programme*

This 'first tier' audit process is supplemented by a 2<sup>nd</sup> tier audit process conducted by either the HSE Manager or HSE Auditors/Champions (trained operators who act as a focal point for HSE issues). Internal audits ensure that our Quality, Environmental and Safety Management Systems are operating satisfactorily, and that our policy and objectives are achieved. Quality Improvements/Non-conformances resulting from the results of audits are undertaken in the shortest practical timescale. Copies of all audit reports are retained and their results are reviewed at Management Review Meetings.

All employees involved in auditing are trained in-house audit techniques and audit sites independent of the areas they work at. Audit reports are monitored to ensure auditor competence.

The 2<sup>nd</sup> tier audit is completed by accessing the AIR system (only authorised and trained auditors are given access). A hard copy document (Internal Audit) is available to assist auditors in preparing for or completing a 2<sup>nd</sup> tier internal audit.

We have a minimum target of 930 (15%) of in scope (live units) to be audited over FY25/26, in the FY24/25 we achieved 1,145 Internal Audits. To assist in this, we have enlisted the support of our external partners Food Alert. They audit using our AIR system and the standard audits are identical to our own internal audits.

### *3<sup>d</sup> Tier Auditing – Independent External Audits*

A third tier audit process is conducted by external bodies accredited by UKAS to an agreed programme. We work with several certification bodies, however the majority of our external audits are conducted by ISOQAR.

### ***Functional Systems Internal Audit and Review***

Food Safety Management System (FSMS): This is reviewed annually with our Primary Authority Partner Luton Borough Council as part of our Assured Advice Agreement. Any changes or updates are then completed and communicated to our unit teams via the communication methods outlined in 7.4 above.

Workplace Safety Management System (WSMS): This is now under an annual review since we launched the new Workplace Safety Management System in October 2022. The initial launch saw the Catering Services integrate into the new WSMS, with the Cleaning, Portering, Business and Office Services to come into effect from March 2023 and then Grounds Maintenance in 2024. We launched Security Services in 2025 and next is Leisure Services in 2026.

### ***Group Internal Auditing***

To ensure that as an HSE Function we also review and validate our own systems and ways of working, we recently took part in a Compass Group Global Audit Programme, where we

were audited by our Group Director of Risk and Audit, Asif Bhati. This Group Audit took place in February 2021. The aim of the audit was to review the Health and Safety (HSE) processes and controls in Compass UK&I. The audit did not identify any significant issues and we are pleased to report the audit has been graded **Green (Good)**. There were 4 Priority 3 (minor) actions to address all of which have now been closed out. A copy of the Group Internal Audit Report is available on request from Mark Armstrong, Compass Group UK & Ireland HSE Director.

#### *Group Allergen Management Audit 2023*

Compass Group Audit Programme conducted a full allergen audit across Compass Group UK and Ireland in January to June 2023, sites from across 4 sectors, B&I, Chartwells, Healthcare and Levy were reviewed along with the Food Safety Management System and compliance with the Global Allergen Management Plan.

Overall, the key controls are operating effectively. We have made some recommendations to further improve the control environment by enhancing the oversight of training and unit-level compliance activity to increase assurance that controls are in place and operating effectively. The report has been graded **Green (Good)**.

There were 6 key improvements to make, which were all implemented with overall completion of implementation confirmed in April 2024.

#### *Compass CPU Audits 2024*

Compass Group enlisted the services of Merieux NutriSciences Certification to conduct audits of 2 of our Key CPU's, which were Cuisine Centre North at St Helens and Glanmore in Dublin, Ireland. These audits scored 99% and 91% respectively and graded **Green (Good)** and any actions have been addressed a site level for close out.

#### *Compass Facilities Management Health & Safety Audit 2025*

Compass Group Internal Audit team conducted an audit of UK and Ireland Facilities Management and Support Services business areas. A total of six units were reviewed from 14Forty, ESS, Venues Collection and PPP-IML. An overall a good level of safety understanding and safe working practices were noted from site visits. Other leading practice controls in place include robust procedures for approval of subcontractors and ongoing assurance processes within Foodbuy over non-food suppliers.

Key processes vary across clients, with different practices noted within the same sector. Some improvements are needed in areas of central guidance, appointment and tracking of authorised personnel, monitoring controls and succession planning. Central oversight is currently limited due to a lack of information, resource constraints, inconsistent document retention and multiple systems. Operational compliance is heavily reliant on few individuals. There is an opportunity for greater digitalisation and various initiatives are currently underway. The report has been graded **Amber (needs some improvement)**. All actions raised have now been closed out.

### **9.3 Management review**

Management reviews are undertaken at least annually to review results and ensure the ongoing suitability and adequacy of the BMS. For evidence of Management Review inputs, outputs and attendees, please refer to the agendas and meeting minutes (Owner: Nicola Clason. HSE Auditing and Systems Manager). A copy of the minutes are available on the HSE Website.

## **10. Improvement**

Opportunities for improvement are measured in different ways throughout the Company whether it be to enhance customer satisfaction or to improve products, services and safety. This includes:

- Internal and external audits (captured within action plans);
- Quarterly HSE Reviews (captured either in unit in HSE Log Book or on AIR3 System);
- Quarterly Business Discussions (captured between the Regional/ Operations Manager and Client on a Quarterly Basis to discuss and review the service);
- Customer Feedback (Controlled at Unit and Sector level);
- Incident Management by way of Hazard Observations;
- Safety Leadership Walks (Opportunities for Improvement) Origami Mobile App.

Reviews of the feedback are then carried out at scheduled meetings or as and when required.

Following these meetings, improvements to processes or procedures are then developed and introduced.

We have also created a Quarterly Trend Analysis Report for Safety Leadership Walks to provide the business with key insights into the outputs of the Safety Leadership Walks so they can then be used by the Leadership and Operational Teams to devise strategic intent. We have created a Compass UK and Ireland Report and then each of the Safety Leads will create sector specific reports to share with their respective Leadership and Operational Teams.