

Fighting Against Forced Labour and Child Labour in Supply Chains

2025 Annual Report



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Serve a
better future

by enriching people, communities and the planet.

OUR COMMITMENT

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

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

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

Our purpose is underpinned by four key beliefs:

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

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



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

In this report, we are proud to share the progress that we have made over the past year. Working with our global Compass Group network, we will continue to build on these efforts in the years ahead.



Saajid Khan
Chief Executive Officer
Compass Group Canada
31 May 2026

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

This is Compass Group Canada's 3rd Fighting Against Forced Labour and Child Labour in Supply Chains report, which has been prepared in accordance with the federal government of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act

Compass Group Canada is committed to identifying and mitigating the risks associated with forced labour and child labour. We regularly invest in strategies, tools, processes, and partnerships to identify and mitigate potential risks across our operations and supply chain—such as our work with the Supplier Ethical Data Exchange (Sedex) and our recently introduced Third Party Integrity Due Diligence (TPIDD) process. We have been supported and guided in these endeavours by our ultimate parent company, Compass Group PLC, which is listed in the UK and is committed to complying with the Modern Slavery Act 2015 (UK).

OUR FOCUS AREAS

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

FOCUS AREAS

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



KEY HIGHLIGHTS—FY25

- Delivered targeted training across key teams, including leadership and management, on our Global Ethics & Integrity annual training, which included human rights awareness focusing on forced labour, harassment, ethical decision-making and how to raise concerns through SpeakUp, We're Listening.
- Participated actively in Compass Group's global Human Rights Working Group, which provides a global forum for best practice sharing, coordination and awareness raising on human rights issues, including modern slavery.
- Ongoing collaboration with supplier partners to support SEDEX onboarding, completion of the Self-Assessment Questionnaire (SAQ), and participation in required audits.

Reporting requirements

Compass Group Canada Ltd. prepared this report in accordance with the Canadian federal Fighting Against Forced Labour and Child Labour in Supply Chains Act, which came into force on January 1, 2024. It sets out the steps Compass Group Canada has taken to prevent and reduce the risk that forced labour or child labour is used at any step of its supply chain during the prior fiscal year ended September 30, 2025. Compass Group Canada's Executive Leadership has approved this report.

This a joint report filed by Compass Group Canada Ltd. on behalf of itself and the following reporting entities: Compass Group Canada Operations Ltd., Canteen of Canada Limited, East Coast Catering Limited, Groupe Compass (Quebec) Ltee., Compass Canada Support Services Ltd., and Food Dudes Inc.



Introduction to Compass Group Canada



COMPASS GROUP CANADA

Compass Group Canada (CGC) is Canada's leading foodservice and support services provider with over 26,000 associates working in 2,500 locations throughout the country. We specialize in providing foodservices and support services, including facilities management and vending services. Compass Group Canada works across a number of core sectors, including leading sports and leisure venues, executive dining rooms and cafes, schools, universities, seniors' residences, and hospitals, in addition to remote camps and offshore oil rigs.

CGC and the reporting entities are companies incorporated in Canada. CGC's ultimate parent company is Compass Group PLC, which is listed in the UK and has operations throughout the world. Compass Group PLC aligns with our commitment of eradicating modern slavery and has published its own Modern Slavery Statement pursuant to the provision of section 54 of Modern Slavery Act Statement 2015 (UK), found here: [here](https://www.compass-group.co.uk/media/dydlaeuw/modern-slavery-statement-2025.pdf)*

*<https://www.compass-group.co.uk/media/dydlaeuw/modern-slavery-statement-2025.pdf>

FOODBUY CANADA

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

Foodbuy Canada manages \$4.8B in purchasing volume from both Compass units and non-Compass members, who also participate in these purchasing programs.



AS COMPASS CANADA, WE...

Serve a better future

by enriching people, communities and the planet.

And we do this because we believe that...



Everyone should be seen and nourished as a whole person



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



Great service starts with understanding what people value most



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



COMPASS OPERATIONS

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

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

Foodbuy Canada Operations

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

\$4.8

billion in managed spend in Canada

400+

contracted suppliers

24,000

member locations

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

Our Global Spread

25+

Number of countries in which we operate

590,000

Number of people we engage and employ globally

5.5 billion

Number of meals served globally per year

OUR SUPPLY CHAIN

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

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



[Foodbuy Canada](#)

Our risk approach

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



OUR GOVERNANCE FRAMEWORK

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

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

Figure 1: Compass Group Canada's risk governance framework





OUR RISK-BASED APPROACH

The hospitality and support services sector has been highlighted by the ILO and other organizations as one where there may be heightened risks of forced labour, particularly due to its reliance on outsourced services, subcontracted labour, and complex labour supply chains. While our directly employed workforce is protected under Canadian labour law, we recognise that risks may exist in the extended labour and goods supply chains that support our operations.

Through our Supply Chain Risk Management (SCRM) framework, we identify and assess risks related to forced labour and child labour within our operations and supply chain, we utilize a risk-based approach that incorporates practical guidance, tools, processes, and audits. Key components to our approach include:

- Sedex provides our businesses' procurement teams with valuable insights through two key tools: independent SMETA audits from approved third-party auditors, and supplier SAQs (Self Assessment Questionnaires), which highlight potential risks in labour standards, human rights, practices and ethical compliance.
- Our Supply Chain Risk Management (SCRM) other organisations as one where there may be heightened risks of forced labframework underpins our risk-based approach. The hospitality and support services sector has been highlighted by the ILO and our, particularly due to reliance on outsourced services, subcontracted labour, and complex, multi-tiered supply chains. While our direct employees are not subject to these risks, we recognise that risks may exist in the extended labour and goods supply chains that support our operations.
- Regular performance reviews conducted by our Risk Management team
- Guidance, knowledge sharing, and lessons learned from our global Human Rights Working Group
- Outcomes of publicly available relevant investigations
- Information from our Speak and Listen Up anonymous program which provides guidance for employees, suppliers and partners to raise concerns. It emphasizes that all reports will be reviewed by Group Ethics and Integrity, an independent team overseeing the Speak Up program. It reassures all stakeholders that their voices will be heard, and their concerns taken seriously.

OUR POLICIES AND STANDARDS

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

Global policies (Compass Group PLC)

Code of Business Conduct (CBC)	Provides principles-based guidance to support Compass' businesses in upholding high ethical standards and commitments, as well as complying with applicable laws and regulations.
Global Supplier Code of Conduct (SCOC)	Extends Compass Group's CBC principles to supply chain partners and sets out our high ethical standards, expectations and principles.
Speak and Listen Up Policy	Empowers and guides individuals on how to raise concerns in a safe, and confidential way, guiding them on how to voice their concerns effectively.
Human Rights Policy	Highlights the responsibility to respect human rights within Compass' businesses and their supply chains.
Third-Party Integrity Due Diligence (TPIDD) Policy	Establishes minimum requirements to assess and monitor new and existing third parties within the scope of the policy.
Responsible Sourcing Policy Statement (RSPS)	Ensures responsible sourcing is central to Compass' businesses and their operations.
Five Golden Rules	Summarises Compass' expectations for employee conduct, behaviours and priorities at work.



OUR EXTERNAL OPERATING FACTORS

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

Foodbuy primarily sources through distributors and wholesalers, which shapes our visibility and approach to managing supply chain risk.

We recognize that risks of forced labour and child labour may be more pronounced within our indirect supply chain, particularly where suppliers have international operations with more limited visibility. We have identified the following higher-risk categories as having a significant presence in our supply chain. We consider our direct and indirect supply chain to span a number of industries with an inherently higher risk of forced labour and child labour. These include farming and agriculture, food production and processing, seafood, packaging materials (such as paper, wood, and plastics), apparel and textiles (including uniforms), and labour providers within supply chains

We partner with Sedex to support the identification and assessment of inherent risks associated with the location and commodities of our suppliers. Through Sedex membership, suppliers complete a self-assessment questionnaire (SAQ), providing insight into labour, human rights, and working conditions within their operations. During the reporting period, we continued to re-engage key suppliers to complete or update their SAQs, strengthening our ability to identify higher-risk suppliers and prioritise further due diligence. This ongoing effort supports increased transparency, accountability, and more effective management of modern slavery risks within our supply chain.

Human rights risks, including those associated with forced labour and child labour are regularly discussed by our global Human Rights Working Group, Supply Chain Risk Management Steering Group, with input from Compass Group's ethics and integrity team, amongst others.

In addition to using Sedex as an assessment tool, Foodbuy Canada's Procurement & Compass Group Canada's Risk Management teams conduct assessments on prospective suppliers. Our contracted food suppliers are subject to annual review, which includes verification of registration and good standing with provincial/local worker's compensation board/commission of the territory it operates if within USA & Canada



MANAGING OUR SUPPLY CHAIN RISKS

As part of our continued efforts to review our global and domestic supply chain risks, Compass Group Canada reinforces our global Supplier Code of Conduct within our Supplier Agreement. Updated in June 2024, the Supplier Agreement requires that our supplier partners review and act accordingly to all applicable principles of the SCOC.

Compass' Global Supplier Code of Conduct (SCOC) is an integral part of our approach to maintaining an effective third-party risk management framework as it sets out the principles, expectations, and behaviours we require our supply chain partners to adhere to. This Code promotes Compass' high ethical standards and principles in our supply chain and sets out our supplier sustainability and responsibility aspirations, including human rights and labour standards.

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

As part of our Supply Chain Risk Management (SCRM) framework, SpeakUp! remains an important mechanism for identifying and addressing risks of forced labour and child labour within our supply chain. Alongside our Supplier Code of Conduct (SCOC), which sets clear expectations for suppliers, SpeakUp! provides a confidential and independently operated multilingual channel accessible to suppliers and their workers to raise concerns. Information received through SpeakUp! is promptly assessed and addressed through appropriate escalation and follow-up actions.

The five focus areas of our global SCOC include

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

Our principle: We are committed to the positive development and enhancement of human rights globally which includes working towards eradicating modern slavery and human trafficking. We are opposed to any and all forms of human rights violations or abuse.¹

WHAT ARE OUR EXPECTATIONS OF SUPPLIERS?

- Comply, at a minimum, with all applicable laws and regulations regarding human rights and modern slavery including but not limited to working hours and days worked, minimum wages, overtime, breaks and rest time, sick leave and annual holidays as well as other mandatory benefits, ensuring that appropriate records are kept
- Treat all employees and workers humanely and ensure that all work is freely chosen
- Ensure they do not use or benefit from any child, forced, bonded or compulsory labour
- Ensure that all of their employees and workers meet the relevant legal minimum age of employment and have in place systems to prevent child labour and exploitation
- Firmly oppose any form of human trafficking and immediately act on any suspected risks or activities in their supply chain
- Immediately act on and investigate any suspected human rights issues in their business and within their supply chain

¹Compass respects the rights enshrined within the United Nations Universal Declaration of Human Rights, the Ethical Trading Initiative (ETI) Base Code, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights and the United Nations Global Compact 10 principles.



SUPPLY CHAIN RISK MANAGEMENT (SCRM) OUR TWO-PRONGED APPROACH

Our SCRM framework combines supplier standards, risk screening, and due diligence tools (including Sedex and OneTrust) to proactively identify and manage supply chain risks.

Proactive Collaboration

Continue to engage and collaborate with suppliers to drive due diligence and continuous improvement, using Sedex to onboard suppliers, generate risk insights through self-assessment questionnaires, and initiate targeted ethical audits where required

Rapid Response

Respond to red flag audit outcomes identified through Sedex using a risk-based approach, working directly with suppliers to review findings, challenge and support progress against corrective actions, and drive continuous improvement through to timely closure

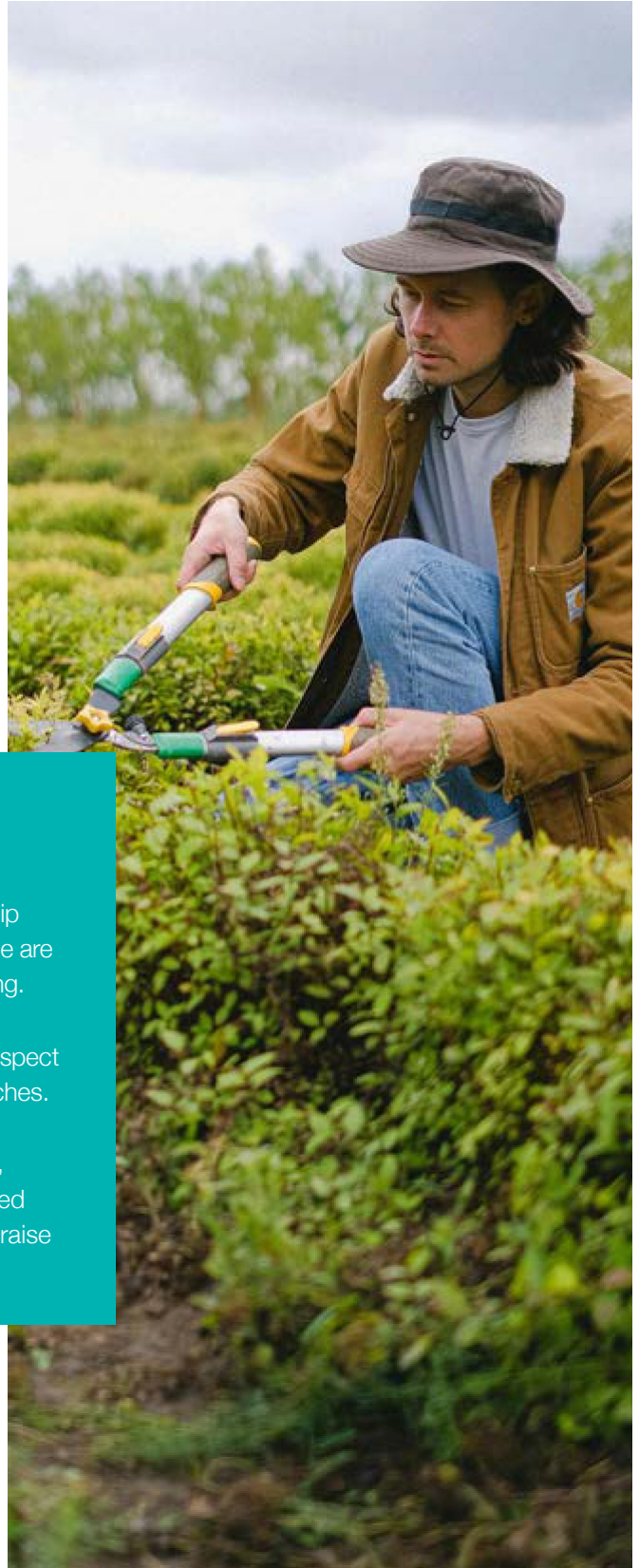


OUR TRAINING APPROACH

Training and awareness are essential to identifying and mitigating the risks of forced labour and child labour in our supply chain.

Internal ethical procurement training focused on raising awareness and recognizing signs and indicators of forced labour and child labour, as well as the escalation processes and procedures in case a concern has been identified

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



TRAINING OUR LEADERS

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

During 2025, our Global Ethics & Integrity annual training, which included human rights awareness focused on forced labour, harassment, ethical decision-making and how to raise concerns through SpeakUp, We're Listening

Assessing the Effectiveness of our Actions



OUR OPERATIONS

We are committed to conducting ongoing risk based human rights due diligence throughout our business and supply chain, and work with third party specialists by risk, priority, geography and issue. We recognize the importance of due diligence in helping provide insight and visibility into the areas of heightened risk our business and Compass business partners face. Employees with direct involvement in areas of human rights risk also receive training on aspects specific to their roles.

The following key performance indicators are used to assess Compass' performance in human rights:

- Workplace safety measures, such as Total Recordable Injury Frequency Rate (TRIFR)
- Total number of incidents of substantiated human rights breaches and actions taken
- Number of human rights concerns related to Compass reported via our Speak Up resources
- Significant actual and potential adverse human rights impacts in the supply chain and actions taken
- Modern Slavery and Human Right straining

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



OUR SUPPLY CHAIN

To identify, assess and manage associated risks, we engage with Sedex and our suppliers to enhance transparency and traceability across our supply chain, alongside other risk management activities.

During the reporting period, no issues related to forced labour or child labour were raised through SpeakUp, We're Listening in Canada. Given the complexity and multi-dimensional nature of these risks, we do not consider the absence of reports through SpeakUp, We're Listening to be evidence of the absence of such risks in our extended supply chain.

OUR APPROACH TO POLICY ENFORCEMENT FORCED AND CHILD LABOUR

Compass Group Canada strictly prohibits the use of forced labour and child labour within our operations and supply chains, as reflected in our Compass Group Canada Supplier Code of Conduct and our global Modern Slavery Statement and Human Rights Policy.

All reported incidents of possible non-compliance are investigated. Where issues are identified, we take appropriate remedial action, including engaging with suppliers to require the cessation of unethical labour practices and to implement corrective actions in line with our standards. Where suppliers fail to address identified issues, we may take further steps, including discontinuing the business relationship, to avoid being complicit in, or indirectly supporting, the use of forced or child labour.



CONSULTATION PROCESS

All of Compass Group Canada's subsidiaries and controlled entities share common values and a commitment to responsible business practices, including playing their part in addressing the risks of forced labour and child labour in our supply chains.

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

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

Report Approval and Attestation



In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Chief Executive Officer, attest that I have reviewed the information contained in the report on behalf of the governing body of the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.

Saajid Khan

Chief Executive Officer

31st May 2026

I have the authority to bind the reporting entities listed in this report.

