Particulars

About Your Organisation

| 1.1 Name of your organization |
|---|
| Compass Group PLC |
| 1.2 What is/are the primary activity(ies) or product(s) of your organization? |
| ☐ Grower |
| ☐ Processor and/or Trader |
| ☐ Consumer Goods Manufacturer |
| ☑ Retailer and/or Wholesaler |
| ☐ Bank and/or Investor |
| ☐ Social and/or Development NGO |
| ☐ Environmental and/or Conservation NGO |
| ☐ Supply Chain Associate |
| ☐ Affiliate |
| 1.3 Membership number |
| 3-0033-10-000-00 |
| 1.4 Membership category |
| Retailers |
| 1.5 Membership sector |
| Ordinary |

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Retailer and/or Wholesaler

| 1 |)ne | rati | ona | ΙP | rofi | ما |
|---|---------|------|-----|----|------|----|
| | JUE | ıau | una | Г | UII | ıe |

| 1.1 Plea | se state your main activity(ies) within the palm oil supply chain. Please select the option(s) that apply to you |
|--|---|
| | □ Wholesaler |
| | □ Retail |
| | ✓ Food service providers |
| | ☐ Own-brand |
| | |
| | Other: |
| Other: | |
| products product said, we the man The mai prepare palm oil brand' c from oth | is Group is a world leading food and support services company. It is important to note that we do not manufacture any sor have any own label products, and do not purchase palm oil directly. This means that whilst we can help to influence the specifications that we purchase from suppliers, we do not have direct control of their composition/ingredients sourcing. That recognize that we have a responsibility to work with our suppliers to ensure that the palm oil used in our kitchens and in ufacturing of the products we buy is Certified Sustainable Palm Oil (CSPO). Palm oil used back of house in our kitchens: n products that we use containing palm oil (cooking (frying) oil and margarine/vegetable oil based spreads) are used to food in our kitchens. Although not Compass Group 'own brand', for the purposes of our palm oil strategy, all palm oil, and based products used back of house (i.e. in our kitchens to prepare food) will be captured and reported under our 'own ommitments. Palm oil in other manufacturers' brands that we source: Many of the products that Compass Group source ter manufacturers either directly contain palm oil, or palm oil products were used in the manufacturing process. These is will be captured and reported under our commitments for 'third party brands'. |
| we use a global | palm oil across our entire business. Compass provides food and support services to millions of people every day. We have footprint, with some 600, 000 colleagues working in around 50 countries across 55, 000 client locations. lage the business in three geographic regions, North America, Europe and Rest of World. |
| 2.1.1 ln | which markets do you sell goods with palm oil and oil palm products? |
| Applies | globally |
| 2.2 Tota | al volume of all palm oil and oil palm products in the goods sold in the year: |
| 2.2.1 To | otal volume of refined /crude palm oil in the goods sold in the year (tonnes) |
| 3,468.00 | |
| | |
| 2.2.2 To | stal volume of crude and refined palm kernel oil in the goods sold in the year (tonnes) |
| 0 | |
| - | |
| 2.2.3 To | otal volume of palm kernel expeller sold in the year (tonnes) |
| 0 | |
| | |
| 2.2.4 To | otal volume of other palm-based derivatives and fractions in the year (tonnes) |
| 0 | |
| - | |

2.2.5 Total volume of all palm oil and oil palm products in the goods sold in the year (tonnes)

3,468.00

2.3 Volume of palm oil and oil palm products used in the year, in your own brand products, that are RSPO-certified (tonnes):

| Description | Crude and Refined Palm Oil | Crude and Refined Palm Kernel Oil | Palm Kernel Expeller | Other palm-based derivatives and fractions |
|---|----------------------------------|--|-------------------------|--|
| 2.3.1 Book and Claim from Mill / Crusher | 2190 | - | - | - |
| 2.3.2 Book and Claim from Independent Smallholder | - | - | - | - |
| 2.3.3 Mass Balance (MB) | 767 | - | - | - |
| 2.3.4 Segregated (SG) | 479 | - | - | - |
| 2.3.5 Identity Preserved (IP) | 32 | - | - | - |
| 2.3.6 Total volume (tonnes) | 3468 | - | - | - |

2.4 According to the information you have provided in this questionnaire, your company has not reached 100% sustainable palm yet by using the four supply chain models (Book and Claim, MB, SG, IP). Do you have plans to immediately cover the gap by using RSPO Credits?

| 2.4.1 When do you plan to cover the gap | o by using | RSPO | Credits? |
|---|------------|------|----------|
|---|------------|------|----------|

2.4.2 Please explain why

2.5 What is the percentage of Certified Sustainable Palm Oil and oil palm products in the total volume handled by your company in the following regions:

2.5.1 Africa

0.7%

2.5.2 Oceania

0.8%

2.5.3 Europe

75%

2.5.4 North America

0.6%

| 2.5.5 Latin America |
|---|
| 1% |
| |
| 2.5.6 Middle East |
| 17.5% |
| |
| 2.5.7 China |
| 0.1% |
| 2.5.8 India |
| 0% |
| |
| 2.5.9 Indonesia |
| 0% |
| |
| 2.5.10 Malaysia |
| 0% |
| |
| 2.5.11 Rest of Asia |
| 4.3% |
| 3.1 Year expected to start (or year started) using RSPO-certified sustainable palm oil and oil palm products, in your own brand products Output Description: |
| |
| 2017 |
| 3.2 Year started/expected to start using any RSPO-certified sustainable palm oil and oil palm products in your own branc products |
| 2017 |
| |
| 3.2.1 If target has not been met, please explain why. |
| |
| 3.3 Year expected to be (or already) using 100% RSPO-certified sustainable palm oil and oil palm products from any supply chain option in your own brand products. |
| 2017 |
| |
| 3.3.1 If target has not been met, please explain why. |
| Last year, we took the landmark step of purchasing PalmTrace credits to cover the uncertified volume of palm oil (within cooking (frying) oil and margarine/vegetable oil based spreads) being used back of house (i.e in our kitchens). We are currently in the process of doing the same for this year and expect to have purchased further credits equating to 2190 metric tonnes of palm oil b July 2019. |

| 2022 | |
|----------------------|---|
| 3.4.1 If ta | arget has not been met, please explain why. |
| | s Group have committed to 100% sustainable palm oil from physical supply chains (Identity Preserved, Segregated, and/ance) by 2022 for all palm oil that is used in our kitchens to prepare food (i.e. treated as own brand). |
| 3.5 Whic | h markets do these commitments cover? |
| Applies g | lobally |
| | your company use RSPO-certified sustainable palm oil and oil palm products in goods you manufacture on other companies? |
| No | |
| | your company have a Time-Bound Plan to only use RSPO-certified sustainable palm oil and oil palm products is sound manufacture on behalf of other companies? |
| No | |
| 3.8 Whe | n do you expect all products you manufacture to only contain RSPO-certified sustainable palm oil and oil palm s? |
| N/A | |
| Trader | nark Use |
| 4.1 Do y | ou use or plan to use the RSPO Trademark on your own brand products? |
| No | |
| 4.2 Pleas | se select the countries where you use or intend to apply the Trademark. |
| - | |
| 4.2.1 Ple Tradema | ase state the year that you started using the RSPO Trademark or the year you plan to start using the RSPO rk. |
| - | |
| | |

| 4.3 Please explain why |
|---|
| ☐ Challenging reputation of palm oil |
| ☐ Confusion among end-consumers |
| ☐ Costs of changing labels |
| ☐ Difficulty of applying for RSPO Trademark |
| ☐ Lack of customer demand |
| ☐ Limited label space |
| ☐ Low consumer awareness |
| ☐ Low usage of palm oil |
| ☐ Risk of supply disruption |
| ✓ Others |
| |
| Other: |
| Compass Group does not source any 'own brand' products. |
| 4.4 Have you uploaded information and images of products using the RSPO Trademark to the RSPO mobile app? |

5. Actions for Next Reporting Period

5.1 Outline actions that you will take in the coming year to promote the use of RSPO-certified sustainable palm oil and oil palm products along the supply chain.

For the last two years, we have used a data capture system to measure the volume of palm oil used across markets that contribute in excess of 93% of our annual revenue. In order to represent better represent a global value, this volume was scaled up to represent 100% of annual group revenue. This system also captures the volume that comes from RSPO member companies, that is RSPO certified. In 2019 this system will be implemented in the remaining in the remaining markets to provide more accurate globally representative values. We recognize that some of the products we source (margarine/vegetable oil based spreads, for example) may contain a smaller volume of other palm oil derivatives such as palm kernel oil. Although our data capture system does not currently capture this volume separately to the crude and refined palm oil, we are continuing to explore options in terms of how we might split this volume out in future.

Compass Group will continue to promote the use of certified sustainable palm oil in other manufacturers' brands. Compass Group has several KPIs in place to promote CSPO use along its supply chain and continues to make steady progress towards achieving our commitments surrounding the sustainable procurement of palm oil.

- In 2019 we will roll out an upgraded Compass Palm Oil Supplier Questionnaire across our key suppliers, however our complex supply chain structure continues to make this process challenging. We commit to having full transparency on products with palm oil, its quantities, and the identification of the split of sustainable and non-sustainable palm oil including the supply chain method in place. We are passionate about increasing visibility, and in 2016 successfully implemented data capture systems in the UK to record the classification of palm oil contained in purchased products and the specific RSPO supply chain method used to certify. These data capture systems will be rolled out across our other major markets, commencing with Europe and North America in the very near future.
- Based on the data collected, Compass Group will look to set incremental targets towards CSPO in other manufacturers' products.
- Compass Group will continue to raise awareness among suppliers and work with them towards the sustainable sourcing of palm oil.

Raising internal awareness

- Continue to raise awareness internally and promote employee engagement on responsible sourcing of palm oil and palm oil products, through regular communications.
- By the end of 2019, we will provided an updated and detailed palm oil policy brief/position statement to all of our global markets. This will help to increase awareness on environmental issues and specifically the impact of sourcing non-sustainable palm oil, as well as re-confirm our 2022 commitment to CSPO.

Buyer Training

- We will roll out buyer training on responsible sourcing highlighting the risks and opportunities associated with palm oil and palm oil products, and share best practice.
- We will begin to monitor a KPI demonstrating the proportion of buyers trained in responsible sourcing and report back in the next ACOP

Publishing a Palm Oil Position Statement

- This 2019 document will clearly set out our responsible sourcing commitments which specifically relate to the sourcing of palm oil and palm oil products.
- It will also provide an overview of our achievements to date and set out our action plan over the medium and long term with the support of our chosen NGO partners.

6. Non-Disclosure of Information

6.1 Information in the sections above are mandatory declarations in your ACOP. For confidentiality purposes, members may choose not to display volume data in Section 2 publicly; however, RSPO reserves the right to utilise the member's data on an aggregate basis for sectoral and total analysis. Please check this box if the member chooses to have the data in Section 2 displayed publicly.

Yes - Display Publicly

7. Application of Principles & Criteria for all member sectors

7.1 Related to company's procurement or operations, do you have organisational policies that are in line with the RSPO P&C? Select all relevant options.

7.1.A Water, land, energy and carbon footprints

File: --

Link: https://www.compass-group.com/en/who-we-are/corporate-governance/policies.html

7.1.B Land use rights

File: --

Link: https://www.compass-group.com/en/who-we-are/corporate-governance/policies.html

| 7.1.C Ethical conduct and human rights | |
|--|-----------|
| File: | |
| Link: https://www.compass-group.com/en/who-we-are/corporate-governance/policies.html | |
| 7.1.D Labour rights | |
| File: | |
| Link: https://www.compass-group.com/content/dam/compass-group/corporate/Who-we-are/Policies/MSA_Transparency_Statement_2018 | J.pdf |
| 7.1.E Stakeholder engagement | |
| File: | |
| Link: https://www.compass-group.com/content/dam/compass-group/corporate/Who-we-are/Policies/Code_of_Conduct_Feb11v2_Re | v%20Jan18 |
| 7.1.F None of the above. Please explain why | |
| | |
| 7.2 What best practice guidelines or information has your organisation provided in the past year to facilitate the uptake of RSPO-certified sustainable palm oil and oil palm products? What languages are these guidelines available in? | |
| Compass Group regularly updates our policies and standards which are circulated internally, with suppliers and/or published on our website. | |
| Specific examples of information circulated in the last year include: | |
| Compass Group 2018 Corporate Responsibility report This report is attached below. Pages 17 - 20 of this report set out our priorities in terms of responsible sourcing. Our responsible sourcing KPI's and targets can be seen on page 22, where for the first time, we took the step of publicly reporting our progress towards our 2022 CSPO palm oil commitment (36% in 2018). We will continue to report this progress annually. | |
| Compass Group deforestation fact sheet In 2016 Compass Group commissioned a specialist service provider to draft a deforestation fact sheet which was designed and used to communicate palm/soy/beef/timber deforestation risks to our global businesses, with an initial focus on Latin America. We continue to roll out this document globally and will be refreshing the content in 2019. | |
| Compass Group continue to participate in the annual RSPO Roundtable meetings and attended the 16th meeting in Sabah, Malaysia in November 2018. We present an executive summary of the conference to our global procurement leadership forum every year, highlighting key observations, opportunities, challenges and overall industry progress. | |
| . Greenhouse Gas (GHG) Footprint | |
| 8.1 Are you currently reporting any GHG footprint? | |
| Yes | |
| 8.1.1 Please upload your publicly available GHG report | |
| File: CGH043_CR Report_AW.pdf | |
| | |
| 8.1.1.1 OR please insert the URL to the GHG section of your corporate website. | |
| | |

8.3 What methodology are you using to calculate your GHG footprint?Our GHG emissions calculations are based on the GHG Protocol Corporate Accounting and Reporting Standard (revised edition).

| 9. Suppo | rt for Oil Palm Smallholders |
|------------|---|
| 9.1 Are y | ou currently supporting any oil palm Independent Smallholder groups? |
| No | |
| | |
| 9.2 If yes | , how are you supporting them? |
| <u>-</u> | |
| | |
| 9.2.1 Do | you have any future plans to support oil palm Independent Smallholders? |
| | |
| No | |
| | |
| 9.2.2 Wh | en do you plan to start your support for oil palm Independent Smallholders? |
| - | |
| 10 Chall | |
| 10. Challe | eriges |
| | at significant economic, social or environmental obstacles have you encountered in the production, procurement, |
| use and/ | or promotion of CSPO and what efforts did you make to mitigate or resolve them? |
| | ☐ Awareness of RSPO in the market |
| | ☐ Difficulties in the certification process |
| | ☐ Certification of smallholders |
| | ☐ Competition with non-RSPO members |
| | ☐ High costs in achieving or adhering to certification |
| | ☐ Human rights issues |
| | ☐ Insufficient demand for RSPO-certified palm oil |
| | ✓ Low usage of palm oil |
| | Reputation of palm oil in the market |
| | ☐ Reputation of RSPO in the market |
| | ☐ Supply issues |
| | |
| | ☑ Others |
| | |

Other:

Compass Group operates at around 55,000 client locations and has a complex multi-tiered supply chain through which it sources the ingredients required to service our clients. Within our supply chain we procure a wide range of commodities from raw ingredients to processed food and drink, but not palm oil directly. Due to such complexities and our widespread support of SME suppliers, we are on a 'journey' of improving the visibility of those products identified with a material level of palm oil content. We have developed data capture systems to gather information on the sustainability standards applied to the palm oil contained in purchased products, this has been successfully implemented in the UK. We plan to roll such systems out to other global markets initially Europe and North America. As use of palm oil is limited with Compass Group, our ability to roll out such systems is dependent on other drivers. We continue to develop and roll out expansive IT systems in wider geographies although the rate of deployment has been a challenge. We have developed a range of sustainable procurement standards, along with training materials on the issues around palm oil. The process of implementation includes a requirement for each country to identify suppliers where risks may exist and to begin to challenge those suppliers to provide products containing sustainably sourced commodities. We actively support the more proactive of our suppliers who are opting for CSPO such as Unilever, and our European French fries suppliers (100% of the contracted volume we purchase is from RSPO members, with 100% of the constituent palm oil being RSPO certified). The need for increased resources is another major hurdle in the use and/or promotion of CSPO. Especially in relation to our complex supply chains, increased administration burden could lead to a significant rise in costs. Although we are happy to devote more resources to promote and use CSPO, it should be noted that although Palm Oil containing products play a role in the Compass Group value chain, they do not constitute a significant proportion of revenue.

10.2 In addition to the actions already reported in this ACOP, how has your organisation supported the vision of RSPO to transform the market for sustainable palm oil in other ways? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)

| ☐ Engagement with business partners or consumers on the use of CSPO |
|---|
| |
| ☐ Promotion of CSPO outside of RSPO venues eg trade workshops industry associations |
| ☐ Promotion of physical CSPO |
| ☐ Providing funding or support for CSPO development efforts |
| ☑ Research & Development support |
| ☐ Stakeholder engagement |
| ✓ Others |
| |
| |

Other:

Compass Group has responded to the CDP Forests program and the WWF Palm Oil buyers scorecard for a number of years and will continue to do so in 2019.

10.3 Please attach or add links to any other information from your organisation on your palm oil policies and activities (e.g.: sustainability reports, policies, other public information)

 $https://www.compass-group.com/content/dam/compass-group/corporate/Acting-responsibly/CGH043_CR\%20Report_AW.pdf$