

Particulars

About Your Organisation

1.1 Member Name

Compass Group PLC

1.2 Membership Number

3-0033-10-000-00

1.3 Membership Sector

Retailers

1.4 Membership Category

Ordinary

1.5 Country

United Kingdom

2.0 Does your company or organisation produce, process, consume or sell any palm oil or any products containing derivatives of palm oil?

Yes

2.1 Please select all description(s) that describe the palm oil-related activities of your company or organisation. Multiple selections are allowed, and not limited to the primary sector of the member's RSPO membership. You will be required to complete the relevant ACOP section based on your selection(s).

- I own and operate oil palm estate(s) and/or palm oil mill(s)
- I represent a palm oil Independent Smallholder farmer Group
- I own and operate independent palm oil mills
- I own and operate independent palm kernel crushing plants - Processors and/or Traders
- I trade or broker palm oil, palm kernel oil or related products - Processors and/or Traders
- I am a refiner of palm oil or palm kernel oil - Processors and/or Traders
- I am a processor of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders
- I am a B2B distributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders
- I manufacture final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by 3rd party contractors - Consumer Goods Manufacturers
- I retail final consumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers
- I operate food retail outlets that use palm oil, palm kernel oil or related products - Retailers
- I am a conservation and environmental NGO supporting the sustainable development of the palm oil industry
- I am a social and human development NGO supporting the sustainable development of the palm oil industry

Retailers

1. Operational Profile

1.1 Please state your company's main activity(ies) within the palm oil supply chain. Please select all options that apply to your operations.

- Retail - with own brand products
- Retail - without own brand products
- Food service providers
- Retail wholesalers
- Other

Other

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2. Palm Oil and Certified Sustainable Palm Oil Consumption

Information in Section 2.0 - Palm Oil and Certified Sustainable Palm Oil Consumption - is a mandatory declaration in your ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed, to enable the RSPO to accurately calculate uptake of individual members, sectors and RSPO members as a whole. ACOP reports without reported volume data will be considered as incomplete and will not be accepted. Incomplete ACOP reports may lead to suspension or termination of RSPO membership.

2.1 Please list down all operations and subsidiaries using palm oil, palm kernel oil and related products that are owned and/or managed by the member, including those under Group Membership

We use palm oil across our entire business. Compass provides food and support services to millions of people every day. We have a global footprint, with some 600,000 colleagues working in around 45 countries across 55,000 client locations. We manage the business in three geographic regions: North America, Europe and Rest of World.

2.1.1 In which markets does your company sell goods with palm oil and oil palm products?

Europe ,North America ,China,India,Indonesia,Africa ,Latin America ,Rest of the World

DL.2.0 In order to facilitate ease of reporting and transparency, RSPO members operating within the palm oil demand supply chain can now choose to report palm oil and palm oil product volumes on:

an aggregate level (as in previous ACOP reporting cycles)

2.2 Total volume of uncertified and certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand products. Third-party brand products containing palm oil should be excluded.

Description	Tonnes
Total volume of crude palm oil (tonnes)	2792.00
Total volume of crude palm kernel oil (tonnes)	0.00
Total volume of palm kernel expeller (tonnes)	0.00
Total volume of crude palm oil/palm kernel oil-based derivatives and fractions (tonnes)	0.00
Total	2792.00

2.2.1 Please estimate the percentage of derivatives and fractions (reported in Question RT.2.2) derived from palm oil or from palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based derivatives.

Description	Percentage
Palm oil-based derivatives and fractions	0
Palm kernel oil-based derivatives and fractions	0

2.3 Please estimate the regional distribution of your company's uncertified and certified palm oil, palm kernel oil and related products sales (as declared in Question 2.2) in the following countries/regions.

Countries/Regions	Percentage
Europe	27
North America	11
Malaysia	0
Indonesia	11
China	0
India	0
Latin America	9
Africa	0
Rest of World	42

2.4 Total volume of RSPO-certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand products. Third-party brand products containing palm oil should be excluded.

Description	Crude/Refined Palm Oil (CSPO)	Crude/Refined Palm Kernel Oil (CSPKO)	Palm Kernel Expeller (CSPKE)	Certified Derivatives and Fractions
RSPO Credits from Mill / Crusher	0.00	0.00	0.00	0.00
RSPO Credits from Independent Smallholder	778.00	0.00	0.00	0.00
Mass Balance (MB)	1834.73	0.00	0.00	0.00
Segregated (SG)	173.61	0.00	0.00	0.00
Identity Preserved (IP)	6.28	0.00	0.00	0.00
Total	2792.62	0.00	0.00	0.00

2.4.1 Please estimate the percentage of RSPO-certified derivatives and fractions (reported in Question RT.2.4) derived from RSPO-certified palm oil or from RSPO-certified palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based

Description	Percentage
Certified Palm oil-based derivatives and fractions	0
Certified Palm kernel oil-based derivatives and fractions	0

2.5 According to the volume information you have provided in Question 2.2 and Question 2.4, your company's Certified Sustainable Palm Oil uptake is:

100.02%

2.5.1 Please provide additional information on your certified palm oil, palm kernel oil and related products uptake. This may include your usage of RSPO Credits to cover gaps in certified uptake, changes due to business environment, variations due to stock positions or efforts to support independent smallholders beyond volume commitments.

This year and annually since 2018, we purchased 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). 100% of the credits we purchased this year were from Independent Smallholders. We are working towards our commitment of 100% CSPO commitment by the end of 2022.

2.6 Please estimate the regional distribution of your company's RSPO certified palm oil, palm kernel oil and related products (as declared in Question RT.2.4) in the following countries/regions:

Countries/Regions	Percentage
Europe	30
North America	17
Malaysia	0
Indonesia	11
China	0
India	0
Latin America	9
Africa	0
Rest of World	33

3. TimeBound Plan

3.1 Which year did your company begin (or expects to begin) using RSPO-certified sustainable palm oil and palm oil products in own-brand products

2017

3.1.1 If the previous target year has not been met, please explain why.

Not Applicable

3.2 Which year did your company begin (or expects to begin) using only RSPO-certified sustainable palm oil, palm kernel oil and related products from any supply chain option in own-brand products.

2017

3.2.1 If the previous target year has not been met, please explain why.

In 2018, 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 aiming to achieve our 100% CSPO commitment by the end of 2022.

3.3 Which year did your company begin (or expects to begin) using only RSPO-certified sustainable palm oil and palm oil products from physical supply chain options (Identity Preserved, Segregated and/or Mass Balance) in own-brand products.

2022

3.3.1 If the previous target year has not been met, please explain why.

2022

3.4 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why

A global initiative

4. Trademark Use

4.1 Does your company use or plan to use the RSPO Trademark in own-brand products?

No

4.3 Please explain why your company does not plan to use the RSPO Trademark in own-brand products

- 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

Others

We do not source own brand products

5. Actions for Next Reporting Period

5.1 Please outline activities that your company will take in the coming year to promote the production or consumption of certified sustainable palm oil (CSPO)

- Participation in RSPO Working Group or Task Forces
- Support Independent Smallholders (ISH)
- Contribute to the RSPO Smallholder Trainer Academy
- Financial contribution to the RSPO Smallholder Support Fund
- Direct investments in Smallholder Certification projects
- Involvement/direct investments in Jurisdictional/Landscape approach
- Direct/collective investments in conservation and restoration initiatives
- Financial contribution to support members with Remediation and Compensation (RaCP) process, direct/collective investments in conservation and restoration initiatives
- Allocating FTE to promote the production or consumption of certified sustainable oil palm products
- Specific policies and action plans by the member to promote CSPO production or consumption in the upstream or downstream supply chain, including target dates or broader policies that include such efforts
- No activities planned
- Others

Other

For the last few 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. The system also captures the volume that comes from RSPO member companies, that is RSPO certified. In 2021, this system was implemented in the remaining markets to provide more accurate globally representative values.

Compass Group will continue to promote the use of certified sustainable palm oil in other manufacturer's 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 2021, we rolled out and 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 of 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 near future. Based on the data collected, Compass Group will look to set incremental targets towards CSPO in other manufacturer's products. Compass Group will continue to raise awareness among suppliers and work with them

towards the sustainable sourcing of palm oil.

During 2021 and so far in 2022, we have actively engaged our procurement teams in all markets to further drive the agenda and transition remaining volumes of palm oil into certified sustainable sources. Monthly calls are taking place with the EME and APAC teams. This activity promotes awareness and keeps palm oil high on the agenda

Shared Responsibility

The Board of Governors of the Roundtable on Sustainable Palm Oil approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility (SR) requirements will be done through ACOP and MyRSPO. As the process of verification of the reports is in development, the Shared Responsibility section in ACOP may change in future ACOP cycles. Evidence to show compliance to the SR requirements shall be uploaded via your membership profile in MyRSPO. Please login to your MyRSPO account and upload the relevant policies, plans and relevant reports there. If you do not have a policy or your policy does not cover all items, you will be required to provide a Declaration of Support for the relevant policy items in your MyRSPO profile. Additional information on the required policies and plans applicable to all sectors as well as the annual uptake targets for supply chain actors can be found on <https://rspo.org/members/shared-responsibility> or email the Shared Responsibility team at sharedresponsibility@rspo.org.

Information & Public Availability

1.1 Does your company have organisational management documents publicly-available?

No

Ethical Conduct & Human Rights

1.2 Does your company have a publicly-available Policy covering Ethical Conduct & Human Rights?

Yes

1.2.1 Does the policy cover:

- Recruitment
- Contractors
- Suppliers and Sub-Contractors

Legal Compliance

1.3 Does your company comply with all applicable legal requirements?

Yes

1.4 Does your company require its third party contractors to comply with legal requirements, i.e. including a clause on legal compliance in the contracts?

Yes

Complaints & Grievances

1.5 Does your company have a Grievance Mechanism that is accessible to all affected parties?

Yes

1.5.1 Is your Grievance mechanism in line with the principles of the RSPO's Complaints System?

Yes

Land Use & FPIC

1.6 Does your company have a publicly-available policy covering Commitment to respect Free Prior and Informed Consent (FPIC) in the Palm Oil Supply chain?

No

Smallholders

1.7 Does your company support oil palm smallholders (groups)?

Yes

1.7.1 Does your company report on the actions to support the inclusion of smallholders?

Yes

Labour & Labour Rights

1.8 Does your company have a publicly-available policy covering Labour & Labour Rights?

Yes

1.8.1 Does the policy cover:

- No discrimination and equal opportunities
- Pay and working conditions at least at legal or industry minimum standards and are sufficient to provide decent living wages (DLW)
- Freedom of association and Collective bargaining
- Protection of children, as well as the workforce of suppliers and third-party contractors
- Prevention of all forms of harassment, including sexual harassment
- No forced or trafficked labour

Occupational Health & Safety

1.9 Does your company have a publicly-available Policy covering Occupational Health & Safety?

Yes

1.9.1 Does your company have a Standard Operating Procedure (SOP) for Occupational Health & Safety?

Yes

Waste Management

1.10a Does your company have a waste management plan that includes reduction, recycling, reusing and disposal based on the hazardous characteristics?

Yes

1.10a.1 Is this plan implemented?

Yes

Water Management

1.11 Does your company have a water management plan to promote efficient use and continued availability of water sources?

Yes

1.11.1 Is this plan implemented?

Yes

Energy Use

1.12 Does your company have an energy use plan to improve the efficiency of the fossil fuels used and to optimise renewable energy?

Yes

1.12.1 Are there records of implementation of the plan ie. monitoring and reporting?

Yes

Climate Change & Greenhouse Gas (GHG)

1.13 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG) including identification and assessment of GHG emissions and implementation of a plan to reduce or minimise them?

Yes

Challenges and Support

1.1 What significant obstacles or challenges has your company encountered in the promotion of certified sustainable palm oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?

- 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
- Traceability issues
- No challenges faced
- Others

Others

Compass Group operates 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. Furthermore we have rolled out a data capture system across our top 93% revenue countries and now have visibility on where Palm oil is being used as part of an ingredient in our kitchens.

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.

1.2 In addition to the actions already reported in this ACOP report, what other ways has your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm?

- Communication and/or engagement to transform the negative perception of palm oil
- Engagement with business partners or consumers on the use of CSPO
- Engagement with government agencies
- Engagement with peers and clients
- Promotion of CSPO through off product claims
- Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations
- Promotion of physical CSPO
- Providing funding or support for CSPO development efforts
- Research & Development support
- Stakeholder engagement
- No actions taken
- Others

Others

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1.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here

<https://www.compass-group.com/en/sustainability/performance-and-reports.html>
<https://www.compass-group.com/content/dam/compass-group/corporate/Who-we-are/Policies/SCI%20Policy%20Statement%202021.pdf>
