



Safety Reporting Guidelines

Purpose and Scope

This document aims at supporting your business in the reporting of:

1. **Personal safety incidents** resulting in a workplace injury (for Group Reporting we report on Total Recordable Injuries Rate (TRIFR) which include Fatality, Lost Time Injuries, Medical Treatment Injuries and Restricted Work Cases).
2. **Food safety incidents** resulting in a food poisoning, an allergic reaction or a preventable consumer-facing foreign body. (for Group Reporting this is substantiated incidents in those categories that make up the Food Safety Incident Rate (FSIR))

By reviewing the definitions and formulas behind the calculation of our safety metrics, our safety performance can be measured in a more consistent way across our global business.

Please note this document focuses exclusively on safety metrics which are MAP reportable. Specific Industry or Client reporting of Health and Safety measurements may vary and our ability to report accurately on those elements should not be impacted in any way by the guidance outlined in this document.

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

Reporting Roles and Responsibilities

Unit Management are responsible for the initial reporting of incidents at a unit level, this is done via the AIR3 online reporting tool. The HSE Sector Leads will be notified of the incidents via email and then they will be responsible for review and applying agreeing incident final status.

Any incidents that fall under TRIFR or FSIR will be reviewed in consultation with the HSE Leadership Team each Friday at 11am to confirm the Group Reporting Status. This process will support data consistency and quality and will reduce the need for intra-year adjustments.

Reporting Timelines

PERSONAL SAFETY			
Incident Type	Near Miss/ Hazard Observation/ Minor Injury/ First Aid	Lost Time, Medical Treatment, Restricted Work Case (TRFIR)	RIDDOR
Reported how	Recorded at Unit Level via AIR3	Recorded at Unit Level via AIR3; Reported to UK&I and Sector Leadership Every Friday	Recorded at Unit Level via AIR3; Reported to HSE (Health and Safety Executive – UK) or HSA (Health and Safety Authority – ROI) by HSE Sector Lead
Reported within	48 hours	24 hours	24 hours; Reported to relevant authority as above within 10 days.
Reported to	Unit Manager + Sector HSE Lead + Country HSE Lead	Unit Manager + Regional Manager + Sector HSE Lead + Country HSE Lead	Unit Manager + Regional Manager + Sector HSE Lead + Country HSE Lead
Additional Actions/ Comments		Reporting to Group Safety Team if injury is significant and requires hospitalisation or surgery	Reporting to Group Safety Team if injury is significant and requires hospitalisation or surgery



FOOD SAFETY			FOOD SAFETY + REPUTATIONAL RISK
Incident Type	CAT A	CAT B	CAT A + CAT B
Reported how	Recorded at Unit Level via AIR3; Reported to UK&I and Sector Leadership Every Friday	Recorded at Unit Level via AIR3; Reported to UK&I and Sector Leadership Every Friday	Recorded at Unit Level via AIR3; Reported to UK&I and Sector Leadership
Reported within	24 hours	48 hours	24 hours
Reported to	Unit Manager + Sector HSE Lead + Country HSE Lead	Unit Manager + Regional Manager + Sector HSE Lead + Country HSE Lead	Unit Manager + Regional Manager + Sector HSE Lead + Country HSE Lead
Additional Actions/ Comments		Reporting to Group Safety Team if injury is significant and requires hospitalisation or surgery	Reporting to Group Safety Team if injury is significant and requires hospitalisation or surgery

FATALITY	
Reported how	Unit Manager to contact Crisis Line and Recorded at Unit Level via AIR3; Reported to HSE (Health and Safety Executive – UK) or HSA (Health and Safety Authority – ROI) by HSE Sector Lead
Reported within	Immediately
Reported to	Regional Manager + Sector HSE Lead + Sector CEO + Country HSE Lead + Group CEO + Group Safety Lead
Additional Actions/ Comments	Crisis Management Team (including Legal, Comms) to coordinate if media or regulatory involvement

Personal Safety Metrics Definitions

Work Related should be interpreted as:

- Ability of the safety team through investigation to substantiate that the injuries sustained aligned with the work performed and in the scope of assigned job duties.
- Substantiated injuries are those that occur during assigned working hours.
- Injuries (physical condition) sustained can reasonably be attributed to the nature of the injury descriptions and work performed.

The Compass definition of 'work-related' includes every incident occurring between the moment when the person arrives at the location where their work is performed and the moment when they leave that same location.

- Business commuting/traveling between two different work locations is included in this definition.
- Private commuting/traveling from/to home or another destination other than the workplace is not included in this definition.

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

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

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



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

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

RIDDOR Reportable to HSE (UK) or HAS (ROI): To be reportable to the authority the above criteria must apply and there must be lost time of ≥ 3 (ROI & NI) or ≥ 7 (England, Scotland and Wales) consecutive days. In ROI, It is also reportable to the HSA if there is no lost time but the injured person is on restricted duties (outside of their normal duties) for ≥ 3 consecutive days.

Food Safety Metrics Definition

A food safety incident is defined as follows:

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

Once substantiated, a Food Safety Incident (FSI) is classed under the Group Reporting Status as follows:

- A. **Category A** = the number of food safety incidents resulting in a food borne illness or allergic reaction, of which:
- **Category A1** = the number of food safety incidents resulting in a food borne illness
 - **Category A2** = the number of food safety incidents resulting in an allergic/intolerance reaction (not limited to regulatory identified allergens)
- B. **Category B** = the number of food safety incidents caused by a foreign body found by a guest (or consumer) in food and products served by Compass Group, of which:
- **Category B1** = the number of food safety incidents caused by a foreign body of supplier origin, that are either:
 - specifically extrinsic* in nature and preventable at unit level
 - or**
 - unexpected intrinsic** bone in processed/formed, meat/poultry/fish containing items that is alleged to have caused dental damage or consumer injury

- **Category B2** = the number of food safety incidents caused by a foreign body of unit origin or accountability (excluding suspected post service contamination such as consumer hair or live insect when dining room pest control is not the responsibility of Compass)
- **Category B3** = the number of food safety incidents caused by a foreign body of unknown origin that are alleged to have caused dental damage or consumer injury

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

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

Please note for all food incidents:

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



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

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

Please note for Category B incidents:

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

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

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

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

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

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

- The foreign body is identified as directly attributable beyond reasonable doubt to the unit environment and equipment **OR**
- The foreign body is identified as directly attributable beyond reasonable doubt to the processes, food preparation, handling and other behaviours of Compass Group employees working in the unit.

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

Total number of Food Safety Incidents $((A1+A2) \times 1.5) + (B1+B2+B3)$ / Total Food Cost (in GBP millions).