



COMPLIANCE POLICY

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1. POLICY

The Compass Group of Companies (“the Group”) has in place a compliance program to give the Board assurance that:

- (a) The Group complies with its statutory, regulatory, industry, client, and social obligations.
- (b) The Group is complying with its internal policies and procedures.
- (c) Complaints and other compliance issues are being properly addressed.
- (d) Monitoring and review processes are in place to ensure the effectiveness of the compliance program.

2. APPROACH

This is achieved by the establishment of a compliance function overseen by the Chief Financial Officer who, with appropriate resources, is responsible for ensuring the Groups operational performance meets its required standards.

The management of compliance takes the following approach:

- (a) Holistic - comprehensive program across all functions and areas of the Group.
- (b) Integrated - incorporated into the Groups Risk Management Program, operational control framework, employment terms, and within the management reporting systems.
- (c) Explicit - Formal, coordinated and documented compliance processes.

3. DELEGATIONS - AUDIT COMMITTEE

The Board has delegated the management of compliance within the Group to the Audit and Risk Management Committee. The Audit and Risk Management Committee is the champion of Compliance within the Group. The Audit and Risk Management Committee will review compliance within the Group at every meeting.

4. DELEGATIONS - COMPLIANCE MANAGER

The Board has delegated the day-to-day processes for management of compliance within the Group to the Chief Financial Officer.

The Chief Financial Officer will:

- 1) Report to each meeting of the Audit and Risk Management Committee.
- 2) Ensure the Compliance program implemented is based on appropriate Australian Standards.
- 3) Liaise with all business units and business areas in the Group to ensure the risks facing the Group are identified and addressed in accordance with company policy and procedure.

5. COMPLIANCE OPERATIONS

The Chief Financial Officer reports to the Chief Executive Officer for the ongoing performance of this function.

The Chief Financial Officer is responsible for maintaining the following functions:

- 1) the compliance program (including compliance monitoring and investigations);
- 2) the complaints system;
- 3) internal audit.

As an essential component of the compliance function, a program is agreed with the Audit and Risk Management Committee for regular contact to be maintained at a senior level with regulatory bodies, key clients, and consumer groups.

Regular contact, liaison and communication will be maintained with line managers within the Group. This liaison is to include continual compliance education for managers and staff where necessary.

The compliance function is supported by information technology systems to assist in the identification of occurrences of non-compliance, and systemic issues.

The Chief Financial Officer is responsible, along with the human resources manager, for the identification and implementation of required compliance training, and addressing compliance performance issues.

In undertaking the compliance role, the Chief Financial Officer places reliance on, and liaises closely with, external legal counsel on legal issues identified from the compliance function. External legal advice will be sought to ensure legal compliance is maintained.

6. COMPLIANCE PROCESS

