

**Compass Group USA, Inc.
Policy on Antibiotics Use in Food Animals**

Introduction

Compass Group USA, Inc. (“Compass”) believes that the declining effectiveness of antibiotics against common bacterial infections is a growing problem in human medicine. Compass believes that this decline stems from heavy use of these precious medicines in human medicine and in agriculture. By some estimates, the majority of the antibiotics now used in the United States are fed on a routine basis to farm animals that are not sick. Moreover, some antibiotics that are among the most potent in human medicine are being used in agriculture, raising concerns about increased bacterial resistance to these critical drugs.

As a culinary company that purchases meat and poultry products, Compass is committed to purchasing and serving food products, including meat and poultry, that are of high quality, safe for consumers and maintain or improve public health. Compass supports the preservation of the effectiveness of antibiotics for human medicine by reducing antibiotic use in animal production, and in particular, by minimizing the use of antibiotics as feed additives. The following principles and policies (the “Policy”) embody Compass’ commitment to quality by favoring reductions in the antibiotics used to produce the pork and poultry products that Compass purchases through the group purchasing organization of which it is a member, Foodbuy, LLC.

Principles

1. **Quality and safety:** Compass is committed to purchasing and serving food products, including meat and poultry, that are of high quality and are safe for consumers.
2. **Animal welfare:** Compass believes that keeping animals healthy is essential to their welfare and, ultimately, protects the health and welfare of end consumers. Good husbandry practices and hygiene, routine health monitoring, and immunizations are keystones of animal health. Compass seeks to purchase pork and poultry products from manufacturers who have implemented such disease prevention strategies to minimize the necessity for the use of antibiotics.
3. **Antibiotics for animals:** Compass acknowledges that animals that become ill must be treated, including with antibiotics, when appropriate. Compass accepts that antibiotics may also be administered to animals whose caretakers reasonably believe are at imminent risk of becoming ill.
4. **Supervise use:** Compass seeks to purchase pork and poultry products from manufacturers who use antibiotics in compliance with all applicable regulatory requirements and only under the supervision of a licensed veterinarian.
5. **People first:** Compass believes that, in general, antibiotics that are in classes used in human medicine should be used in animals only for disease treatment after careful consideration of reasonable alternatives, including the use of antibiotics belonging to classes not used in human

medicine. Compass seeks to purchase poultry and pork from suppliers who share this belief and operate their businesses accordingly.

6. Limit exposure: Compass believes that exposure to antibiotics for disease treatment, control or prevention should be minimized by limiting treatment to animals diagnosed as ill or to animals that caretakers reasonably believe are at imminent risk of contracting a specific disease, using the narrowest spectrum antibiotic, treating the fewest animals indicated, and treating only for as long as needed for the desired clinical response.

7. Record keeping: Suppliers must maintain accurate records of all antibiotic administrations to certify compliance with the Policy. Records of extra-label therapies should be delineated.

Compass' Antibiotics Policy

1. For pork, Compass prohibits the purchase of pork in which antibiotics that belong to classes of compounds approved for use in human medicine have been used for growth promotion purposes.

2. For chicken, Compass prohibits the purchase of chicken in which antibiotics that belong to classes of compounds approved for use in human medicine have been used for growth promotion purposes.

3. Compass will not approve as a preferred supplier chicken suppliers that use fluoroquinolone antibiotics because fluoroquinolones are considered "drugs of last resort" for human medicine, including for the treatment of food-borne pathogens, and protecting their effectiveness is critical.

4. Compass encourages sustained reduction in the total use of antibiotics belonging to classes of compounds approved for use in human medicine for *all* food animal production. Such reductions will be viewed as a purchasing preference.

Compliance

Tracking and Reporting: Suppliers will be required to track internally usage of each antibiotic used in feed or water.

Suppliers will be required to report annually to Compass or Foodbuy on the use of antibiotics as detailed below.

For pork:

- total feed or water antibiotics used per 100 lb. live weight of animal produced

For poultry:

- total medically important antibiotics in feed per pound of chicken produced,
- total medically important antibiotics in water per pound of chicken produced, and
- average number of days that animals are administered antibiotics.

This data will be used by Compass to determine compliance with this Policy, and will be held as privileged and confidential business information.

Supplier Certification and Assurance: Suppliers will be requested to certify annually to Compass or Foodbuy their compliance with this Policy. Compliance may be determined through an annual third-party audit of their antibiotic use policies and records. As appropriate, these audits may be accomplished via third party verification processes already used by suppliers.

Implementation

Effective Date: This Policy will take effect as of August 1, 2005.

Purchasing decisions: Compliance with the Policy is mandatory for food animals which suppliers directly control for the duration of the animals' lives. Compliance with the Policy is also a purchasing preference with regard to purchasing other meat, seafood and dairy products. Additional measures leading to demonstrated sustained reductions in the use of antibiotics belonging to classes approved for use in human medicine will also be considered a purchasing preference in supply decisions for beef, pork, seafood and poultry.

Updates: This Antibiotic Use Policy will be updated as necessary to be consistent with new scientific knowledge and new government laws.

Industry advocate: Compass will advocate for responsible antibiotic use both within its supply chain and within the food industry as a whole.

Definitions

Antibiotic: This Policy uses the term "antibiotic" to include all antimicrobial drugs that kill or suppress the growth of bacteria. Antimicrobials are substances of natural or synthetic origin that are used for treatment of infection or disease that kill or inhibit the growth or multiplication of microorganisms.¹

Growth Promotion: Growth promotion refers to the use of antibiotics, when used as approved by the U.S. Food and Drug Administration, for feed efficiency or weight gain.

Nontherapeutic: Nontherapeutic use refers to any use of an antibiotic as a feed or water additive for an animal in the absence of any clinical sign of disease in the animal. Nontherapeutic uses generally include growth promotion, feed efficiency, weight gain, routine disease prevention, or other routine purpose. Antibiotic uses are not covered under this definition if they are for:

¹ (American Veterinary Medical Association Judicious Therapeutic Use of Antimicrobials, <http://www.avma.org/scienact/jtua/jtua98.asp>).

a) **Non-routine Disease Prevention:** Non-routine disease prevention refers to the use of antibiotics where it can be shown that a particular disease is present on the premises or is reasonably likely to occur because of a specific, non-customary situation² or

b) **Disease Therapy:** The use of antibiotics, under the direction of a certified veterinarian, for the specific purpose of treating animals with a diagnosed disease or illness; provided that, once the treatment is over and the animal is cured, the application of the antibiotic ceases.³

Food Animal: This term is used in this Policy to refer to all species of farmed animals used for food, including cultivated fish and shellfish and dairy animals.

Fluoroquinolone: This term refers to a group of relatively new, highly-effective antibiotics that includes the drug ciprofloxacin (Cipro) used in people and the closely related drug enrofloxacin (Baytril) used in some food animals.

² Adapted from WHO Global Principles for the Containment of Antimicrobial Resistance in Animals Intended for Food, http://www.who.int/emc/diseases/zoo/who_global_principles.html

³ Adapted from the World Veterinary Association's Prudent Use of Antibiotics Global Basic Principles and Canadian Committee on Antibiotic Resistance, <http://www.ccar-ccra.org/agriglos-e.htm>