



RESPONSIBLE BUSINESS CONDUCT

We are **ALL** responsible



Sodexo Supplier Code of Conduct 2024



Sodexo Supplier Code of Conduct

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Introduction

Conducting responsible business with high ethical and environmental standards is fundamental to Sodexo.

In light of this, we have established this Supplier Code of Conduct to articulate our expectations of those with whom we conduct business including those businesses with which we have continuing supply relationships.

This Supplier Code of Conduct (“Code”) sets forth Sodexo's expectations of suppliers, vendors, contractors and others with whom Sodexo conducts business (including their affiliates, and collectively referred to as “Suppliers”) with respect to sound and responsible ethical, social, labor and environmental practices. Sodexo recognizes that Suppliers operate in different legal and cultural environments throughout the world. Regardless, this Code sets forth the minimum requirements that we expect our Suppliers to meet, or to ensure such requirements are consistent with their own business principles, to do business with Sodexo. Consequently, Suppliers are expected to communicate the principles of this Code throughout their supply chain.

To uphold the critical priority of this approach, Sodexo reserves the right to carry out the controls that it deems reasonably necessary to ensure that this Code is respected throughout its Supply Chain. This may include self-assessments, the use of questionnaires conducted by third parties (e.g.: EcoVadis), and/or on-site Sodexo or third-party audits of Suppliers (announced, semi-announced or unannounced).

Sodexo acknowledges that Suppliers may need a reasonable period of time to address areas in which they may not be in compliance with the Code. We believe that compliance is best achieved through a step-by step process of continuous improvement over a reasonable period of time, which includes dialogue with Sodexo. With this in mind, Sodexo has developed the Sodexo Supplier Code of Conduct - Supplier Guide which guides Suppliers as to how they can implement the Sodexo Supplier Code of Conduct. Sodexo invites its Suppliers to keep us regularly informed about their actions and improvement plans concerning the Code of Conduct and welcomes evidence where exceeding the minimum is achieved by our Suppliers.

When local law sets higher standards than our Code of Conduct, the law should always prevail. If, on the other hand, our Code of Conduct provides for more stringent rules, they must prevail, unless this results in illegal activity.

Sodexo encourages its Suppliers to support the achievement of its corporate responsibility commitments (available on [sodexo.com](https://www.sodexo.com) pages) as well as the United Nations Sustainable Development Goals.



The Code is aligned with the [2030 United Nations Sustainable Development Goals](#) as at the release date of this Code.

1. Business integrity



Sodexo is committed to the highest standards of business integrity. We do not tolerate any practice that is inconsistent with the principles of honesty, integrity and fairness, anywhere in the world where we do business.

Sodexo seeks to identify Suppliers that conduct business with ethical standards consistent with our own. Sodexo's ethical standards are embodied in our Code of Conduct ([Business Integrity Guide](#)) which provides in part (and as defined therein where required):

- Obey all applicable laws and regulations
- Treat each other fairly, with dignity and respect
- Prepare all records of financial transactions carefully and accurately
- Report financial conditions and results of operations, honestly and promptly
- Deal honestly and fairly with clients, customers, Suppliers, and financial partners
- Avoid actual and potential conflicts of interest
- Avoid the improper giving and/or receiving of gifts
- Safeguard Sodexo's assets
- Protect confidential and proprietary information (and as described in point 5 below regarding Information Protection)
- Protect Sodexo's reputation
- Separate personal political activities from Sodexo's business
- Report observed violations of all applicable laws and regulations and ethical standards.

Suppliers shall not engage in any acts of unfair competition, bribery or corruption, in any fraudulent practices, facilitation, money laundering or tax evasion. **Suppliers shall** have reasonable internal controls in place to prevent, detect and respond to unusual or suspicious activity. **Suppliers shall** inform Sodexo without delay of any act of corruption or bribery, or related suspicion, as well as conflict of interest, fraud, or influence peddling that they become aware of in connection with their business relationship. Business decisions shall be made objectively and without any personal consideration. We will interact with third parties in a transparent and honest manner. Gifts or entertainment may be offered to people if they are modest and appropriate, and in accordance with the applicable Sodexo local gifts and invitations policy and local laws. Gifts received or offered should never influence nor aim to influence a business decision. We expect our Suppliers to adhere to and implement measures with their own employees and suppliers that align with the principles and policies described in the Supplier Guide.

2. Human rights and fundamental rights at work



Sodexo is committed to respect human rights wherever we do business.

We will give effect to this commitment by working to implement and strengthen practices and procedures to prevent, mitigate and, where appropriate, remedy adverse human rights impacts that may result directly from our operations or that may be linked directly to our business through our relationships with Suppliers. Our commitment and implementing practices and procedures are informed by international instruments, including the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and by the guidance set forth in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

We expect our Suppliers to conduct their business in a manner that demonstrates respect for human rights, consistent with the principles below and to take all reasonable steps to address human rights risks in its existing supply chains and in any part of its own business.

Elimination of all forms of forced or compulsory labor

Suppliers shall not use indentured, slave, bonded or other forced involuntary labor.

Suppliers shall ensure that work is performed voluntarily, in exchange for lawful compensation, and not subject to actual or threatened criminal penalty or prosecution, violence, confinement, retention of identity documents, or forfeiture of legal rights or privileges. Workers must be free to consent to enter into employment and free to leave the employment at any time without penalty, with reasonable notice in accordance with applicable laws and regulations, collective agreements, and operational constraints.

Suppliers shall not allow contract substitution, misleading migrant workers on terms and conditions of employment.

Suppliers shall not allow debt-induced forced labor, which refers to offering loans or wage advances from employers or labor recruiters in exchange for a pledge by a worker of his or her labor or of that of a family member in order to repay the loan.

Suppliers shall ensure to prohibit recruitment fees in their supply chain (no one shall pay to work) and cover all the costs associated with the recruitment process.

Suppliers shall not forcefully retain, confiscate or destroy employees' identity and personal documents such as passports, bank documents or travel documents, amongst others.

Effective abolition of child labor

Suppliers shall not permit workers under the legal age of employment to work in any country or local jurisdiction where the Supplier performs work for Sodexo. If the minimum age of employment is not defined, the minimum age of employment shall be 15 years of age. No person shall be employed under the age of 18 for sea-based work or as required by law, whichever age is higher. Regardless of the legal minimum age, in cases where minors are authorized to work, **Suppliers shall** observe all legal requirements, particularly those pertaining to hours of work, wages, minimum education and working conditions.

Suppliers shall set and respect clear age limits for work that can be mentally, physically, socially or morally dangerous or harmful to young workers. Young workers are defined as being workers who are over the minimum age as defined previously and under the age of 18.



Elimination of discrimination in respect of employment and occupation

Suppliers shall not discriminate against employees in hiring, assignment of tasks, promotion, salary, performance evaluation or any other term or condition of work (training, access to benefits, etc.), on the basis of race, color, national origin, social origin, political opinion, gender, gender identity, age, sexual orientation, religion, or disability. **Suppliers shall not** discriminate on any other basis that is prohibited by applicable laws and regulations.

Freedom of association and effective recognition of the right to collective bargaining

Suppliers shall respect the right of employees to join or not to join the trade union of the employees' choice and to bargain collectively, free from any form of retaliation, intimidation or harassment. Employees shall not be subject to intimidation or harassment in the exercise of their right to join or to refrain from joining any labor organization.

Wages and benefits

Suppliers shall not pay less than the minimum wage in accordance with applicable laws and regulations. Where the applicable laws and regulations do not set a minimum wage, **Suppliers shall** pay at least the prevailing market wage for the relevant job.

Suppliers shall ensure that relevant workers are compensated overtime hours at the legally mandated premium rates, are not required to work overtime in order to earn minimum wage and receive all statutory benefits and insurance mandated by applicable laws and regulations.

Working hours

Suppliers shall comply with all applicable laws and regulations regarding working hours for employees, including maximum hour limitations and requirements for break times. **Suppliers shall not** require employees to work in excess of legal overtime thresholds, except as may be required by emergency or may be lawful based upon the nature of the work.

Health and safety

Health and Safety is an integral part of Sodexo's mission to improve Quality of Life. Sodexo is committed to achieving a global health and safety culture and zero harm mindset. The engagement of our Suppliers is essential for continuous improvement towards this objective.

Suppliers shall provide a safe and healthy workplace and working conditions. Health, safety and other workplace standards including those related to the design, construction and maintenance of facilities for employees and contract workers must, as a minimum, comply with all applicable laws and regulations.

Suppliers shall maintain and keep in force, at their own expense, a workers' accident compensation scheme, whether public or private (such as workers compensation insurance), as required by the applicable laws and regulations for all their employees that provide any products or perform any services for Sodexo.

Suppliers shall encourage a workplace culture of health and safety and **shall** have appropriate incident and health and safety hazard reporting processes and systems in place. So, that employees can easily raise and discuss their concerns, report any work-related accident or near miss and enable root causes to be determined and effective prevention controls to be implemented.



Living conditions

Suppliers shall ensure that worker housing, where provided, meets the same standards for health and safety as those that apply in the workplace always including and without limitation: running and potable water, adequate sanitary facilities, respect of all relevant collective building regulations, and clean and safe facilities.

Suppliers shall ensure that living conditions respect employees' dignity and right to privacy (e.g.: a locker for every worker living in the community).

Disciplinary practices

Suppliers shall treat everyone with dignity. **Suppliers shall not** inflict or threaten to inflict corporal punishment or any other forms of physical, sexual, psychological or verbal abuse or harassment on any employee.

Suppliers shall have a clear disciplinary process that forbids violence, harassment or intimidation in any physical or emotional form, and communicate it in a language understood by employees.

Land rights

Suppliers shall respect the land rights of individuals, indigenous people and local communities, land ownership and natural resources with specific consideration to water and forests. All negotiations (usage, leasing and purchasing) with regard to their property or land of individuals, indigenous people and local communities, including the use of and transfers of it, shall adhere to the principles of free, prior and informed consent, contract transparency and disclosure. **Suppliers shall** recognize the customary tenure, use and other associated rights of local communities and indigenous people.

3. Environment



Sodexo is committed to protecting and restoring natural resources on which we all depend. By working together with all our stakeholders, we aim to address climate change, biodiversity loss and water stress, and create a more sustainable world.

Suppliers shall, where reasonably possible, demonstrate their commitment to decarbonization by signing up to the Science Based Targets Initiative (SBTi).

Suppliers shall abide by all applicable environmental laws and regulations and manage their environmental impact responsibly in line with applicable laws and regulations and in alignment with our [2040 Net Zero goal](#).

Suppliers shall work to sustain, protect and restore the environment and have clear and publicly available environmental policy statement and targets (including greenhouse gas (GHG) emission reduction commitments) that address the key material impacts of their operations and value chains.

Suppliers shall measure, manage and publicly report the energy and greenhouse gas (GHG) emissions associated with their operations globally and related to the products and/or services provided to us.

Suppliers shall ensure that their sourcing, farming, manufacturing, and/or distribution activities do not adversely affect biodiversity and ecosystems.

4. Inclusive supply chain

Sodexo's Supply Chain Inclusion Program is an integral part of the Group's commitment to improve the Quality of Life for people working for our Suppliers, the development of local communities and demonstrates our commitment to engage and influence stakeholders on social and economic responsibility throughout the supply chain.

Engaging diverse and inclusive Suppliers within the local communities where we operate gives both our Suppliers and Sodexo the advantage of working with the best, most agile and innovative companies.

Sodexo expects its Suppliers to demonstrate a diverse workforce composition actively embracing workforce age, gender, national or ethnic origin, social origin, religion, language, political beliefs, sexual orientation, physical ability and promoting supply chain inclusion throughout their own supply chains.

Suppliers shall promote and work with Sodexo to ensure new and growing opportunities for diverse businesses across the globe.

5. Protection of information and data privacy



Confidentiality and protection of information

Sodexo is committed to protecting the Confidential Information of everyone Sodexo does business with, including suppliers, clients, customers, consumers and employees, ensuring that such Confidential Information is used in full compliance with applicable laws and Sodexo policies and only related to Sodexo business.

Suppliers shall comply with all relevant laws and regulations governing proprietary information and safeguard all information received by Sodexo by ensuring that such information is used only for authorized purposes, only shared with authorized persons and is properly and securely maintained. **Suppliers** with access to such information or any other information which is determined to be confidential information or confidential personally identifiable information **shall** consult with the Sodexo Business to whom they are providing products or services with any questions regarding appropriate uses of such Sodexo information.

Privacy and Data protection

Sodexo is committed to protecting the Personal Data of all individuals from whom Sodexo collects such data, including Suppliers, clients, consumers, Supplier's employees and all other individuals and/or entities. Sodexo is also committed to ensuring that such Personal Data is processed in full compliance with applicable data protection, privacy and cybersecurity rules and laws and only for purposes related to Sodexo's business.

Personal Data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Suppliers shall comply with all applicable privacy, cybersecurity and data protection rules and laws as well as with the Sodexo data protection policies when they collect, store, process, disclose, transfer and/or share Personal Data, in particular regarding the management of security incidents and suspected or actual Personal Data breaches, meaning a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

In addition, when Suppliers process Personal Data on behalf of Sodexo, **Suppliers shall** comply with the provisions of the contracted Data Processing Schedule or Agreement and ensure a responsible usage of data including Personal Data in compliance with the nine following principles:

- Integrity by always taking into consideration the potential impacts that data usages could have on individuals and human rights;
- Vigilance by monitoring and assessing the potential impacts of the data usages throughout the entire lifecycle of the data;
- Security by default by maintaining the highest degree of security to ensure the security of the data that is entrusted to the Suppliers;
- Fairness and Transparency by providing a clear information on the data usages, its benefits and the technologies at stake;
- Accountability by promoting accountability and fostering responsibility of all relevant stakeholders involved in the data projects;
- Awareness by providing regular training on recent technologies and applicable regulations;
- Governance by assisting Sodexo in its review of the data projects from an ethical standpoint and ensuring relevant trainings of the Suppliers personnel;
- Data Quality by ensuring that the right data is collected or produced and monitored throughout its lifecycle;
- Security and Privacy by Design by ensuring that security, privacy and fundamental rights are always considered at the beginning of all data projects.

6. Responsible sourcing



Every tier of a supply chain must have responsible operations in compliance with all laws and regulations. Sodexo is committed to responsible sourcing and working closely with its Suppliers to make sure they ensure health and wellbeing, foster social equity and protect and restore natural ecosystems across our supply base.

Suppliers shall strive towards improving the efficiency and sustainability of their operations.

Suppliers shall support Sodexo in its objective to increase supply chain transparency, improve the traceability of the raw materials and mitigate sustainability risks in our value chains. Therefore, **Suppliers shall** implement their own due diligence programs, flow their set of requirements further upstream into their supply chains and conduct direct verification to ensure sufficient compliance.

Suppliers shall ensure agricultural supply chains are economically, socially and environmentally sustainable and work continuously towards more sustainable agricultural practices by treating farmers and workers fairly, reducing negative environmental impacts, protecting natural capital and supporting wider economic benefits for farming communities.

Suppliers shall support the transition to a circular economy and put circular ways of working into practice (e.g.: increase recycled content and recyclability, promote sustainable innovative solutions for packaging, zero waste to landfill, etc.).

Suppliers shall put in place appropriate systems to minimize, handle, store, transport, and dispose of waste in a responsible manner.

Suppliers shall ensure compliance with applicable laws and classification regulations relating to purchasing, storage, handling, use and transportation of chemical.

7. Reporting



Suppliers shall provide accurate and timely reporting of information reasonably required by Sodexo to enable Sodexo to comply with all applicable laws and regulations in relation to providing or disclosing information required by any relevant governmental body, institution or organization.

8. Grievance mechanism



Sodexo acknowledges the elements defined by the **UN Guiding Principles on Business and Human Rights** for an effective non-judicial grievance mechanism and strives to provide access to a mechanism that follow these criteria. **Suppliers shall** report any

violation of the law, our Code of Conduct and/or its policies and associated regulatory requirements. **Suppliers shall** establish processes or mechanisms where employees or their representatives can raise issues of concern without fear of retaliation or negative repercussions. **Suppliers shall** ensure such mechanisms are clearly communicated to all workers and their representatives, and all workers must have equal access.

Focus on Speak Up Ethics Line

Sodexo Speak Up Ethics Line provides Sodexo employees and Suppliers with a confidential way to report activities or behaviors that are contrary to our Code of Conduct or illegal. All reports will be carefully reviewed by us.

Who can report?

Everyone working for or on behalf of Sodexo can file a report. It is also open to any party with whom Sodexo has or has had some type of business relationship (such as business partners, Suppliers, shareholders, agents, distributors, representatives and consumers) who wish to raise a concern about possible misconduct.

What can be reported?

Sodexo Speak Up Ethics Line can be used to report concerns about suspected business abuse within Sodexo and in good faith, that is: any violation of the law, our Code of Conduct and/or its policies.

How to file a report?

If anyone suspects misconduct and genuinely believes that the matter cannot be dealt with through the available channels, the external Sodexo Speak Up Service is available. This gives the opportunity to raise concerns confidentially and in own language. Sodexo Speak Up Ethics Line is run by an independent third party and is available 24/7, 365 days a year. There are two ways to submit a report through Sodexo Speak Up:

- File a report online, please visit the Sodexo Speak Up Ethics Line's website at www.speakup.sodexo.com
- File a report by phone, please call the Sodexo Speak Up number in your country if available. Please check www.speakup.sodexo.com for the phone number and further instructions.



Any person who reports through the Speak Up Ethics Line is protected. Please feel confident that no one will not suffer for raising concerns in good faith about suspected misconduct. Any form of threat or retaliation will not be tolerated. Retaliation is treated as a disciplinary matter.

Additional information concerning Sodexo Speak Up Ethics Line is available on our website www.sodexo.com

9. Implementation



Suppliers shall take appropriate steps to ensure that the principles of this Code are communicated to their employees and throughout their own supply chains. **Suppliers shall** also take appropriate steps to ensure that the principles of this Code are adopted and applied by their employees, suppliers, agents and contractors to the extent applicable.

Suppliers shall establish processes or mechanisms where employees can raise issues of concern without fear of reprisals or negative repercussions.

Sodexo reserves the right to carry out the controls that it deems necessary to ensure that this Code is respected throughout its Supply Chain. This may include self-assessments, the use of questionnaires conducted by Third parties (e.g.: EcoVadis), on site Sodexo or third-party audits of Suppliers. Sodexo reserves the right to terminate an agreement with any supplier who does not comply with this Code.

In the foreseeable future, reporting requirements on the relevant actions Suppliers take both within their own operations and their supply chain, will become necessary. It is the policy of Sodexo to incorporate the principles of this Code into any agreement between a Supplier and Sodexo.

This Code will be updated from time to time to keep it relevant based on feedback from internal and external stakeholders.

In addition to the compliance with this Code, Suppliers will be asked to comply with the Sodexo Sustainable Seafood Supplier Charter, the Sodexo Animal Welfare Charter and other documents as appropriate to the products and services that they provide.

Additional information concerning Sodexo's Corporate Responsibility is available on our website www.sodexo.com

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