

A man with short brown hair and a light beard, wearing a blue polo shirt, is smiling and looking upwards and to the right. He is holding a large, textured red blanket. The background is a soft, out-of-focus indoor setting with warm lighting.

Creating a Better Day for Everyone. In Business and Beyond.

sodexo 

Human Rights & Modern Slavery Report
February 27th 2026



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Tackling modern slavery

As Sodexo celebrates its 60th year, I'm reminded that our company was built on the pioneering vision of our founder, Pierre Bellon. From the very beginning, his ambition was clear: to build "a fairer and more humane society" and to create services that improve quality of life for people everywhere.

We are, and always have been, a people business. Across the UK and Ireland, more than 30,000 colleagues contribute to our purpose of creating a better day for everyone, be that our clients, customers or communities we serve. Our people are central to everything we do, and our commitment to them rests on three core pillars: Belong, Act and Thrive. These principles guide the experience we want every employee to have when they work with us, an experience rooted in culture, belonging, responsibility and opportunity. But our responsibilities do not stop with our own teams.

As part of Sodexo's global network, we work with more than 5,000 suppliers, and we continue to embed social impact into every part of this ecosystem. Our contribution to the UK and Ireland's levelling-up ambitions includes a sustained focus on widening access to all opportunities for everyone. We want our partner organisations to thrive alongside us, supported by resilient, sustainable practices.

I am proud to work for a company whose values align so strongly with the principles of the Modern Slavery Act 2015. Pierre Bellon instilled in this organisation a deep respect for human dignity, and that commitment is evident today in our stance against all forms of forced or compulsory labour.

As a signatory of the UN Global Compact, we uphold human rights in line with the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. We also recognise the specific vulnerabilities faced by survivors of modern slavery; whether physical, psychological, financial or digital. To combat this, strong policies and processes are in place to help protect workers across our operations and supply chain. This statement provides detail on our actions and commitments, including: - our supply chain (page 8) - our policies, principles and approach (page 13) - our due diligence processes (page 16) - supplier assessment and management (page 20) - training and effectiveness measures (page 22) - and our priorities for the future (page 28).

As we enter our seventh decade, Pierre Bellon's founding vision remains as relevant as ever: a company that grows by improving lives. Upholding human rights and preventing modern slavery is not simply a legal obligation, it is a moral one, and one we take deeply to heart. We must continue to be vocal, vigilant and united in safeguarding the highest standards of ethical conduct across our business and throughout our global value chain.



A handwritten signature in black ink, appearing to read 'Bill Buchan'.

Bill Buchan
Human Resources Director
Sodexo UK & Ireland





Our global success and performance are founded on our independence, our sustainable business model and our ability to develop and engage our 423,000 employees worldwide

Knowing our business

Sodexo Holdings Limited, Sodexo Limited, Sodexo Remote Sites Scotland Limited and Sodexo Global Services UK Limited are subsidiaries of our parent company Sodexo S.A., which is headquartered in France.

Operating in 45 countries and serving 80 million consumers every day, our global success and performance are founded on our independence, our sustainable business model and our ability to develop and engage our 423,000 employees worldwide.

Here in the UK and Ireland our employees serve clients in more than 2,000 locations across the corporate, healthcare, schools, universities, sports, leisure and travel, government and energy, and resources sectors.

We deliver more than 100 services across the region ranging from catering, cleaning, reception, and accommodation to asset management, security, laboratory and grounds maintenance services, enabling our clients to focus on their core business.



Our supply chain

Throughout 2025 Sodexo Supply Management has continued to strengthen our approach to tackling modern slavery. We have further developed our systems and processes, to ensure we deepen our understanding of modern slavery risks, we remain up to date with evolving threats throughout markets, and maintain robust and effective controls. We remain committed to leading by example, working proactively across the UK and Ireland to educate, raise awareness, and help address modern slavery within our supply chains and the wider economy. Sodexo has held a Modern Slavery Assessment Tool score of 98% for over 4 years and sits in the Top 2% of companies worldwide on the Ecovadis Sustainability Assessment.

Sodexo takes a comprehensive approach to tackling modern slavery through a three-pillar strategy (compliance, educate, leverage), supporting action across all angles: with our clients, within our supply chain, and through wider thought leadership in the industry. From the bid stage and throughout the life of each contract, we work closely



with clients to support them to tackle modern slavery risks, guide our supply chain to uphold the highest standards while supporting capacity building and contribute to broader initiatives that raise awareness, share best practices, and drive change across the UK and Ireland. We have completed a series of events supporting NGOs, organisations, UK and Northern Ireland Government and clients with modern slavery navigation.

Compliance

Sodexo leverages Ecovadis' Sustainability Assessment both within our own operations and across our supply chain to drive responsible business practices. Ecovadis provides a robust framework for organisations of all sizes and across multiple industries to identify, assess, and manage environmental, social, and ethical risks throughout their business ecosystem.

Following a rigorous review of our supply base, we have implemented a new audit regime completed by our chosen independent APSCA accredited partner, Verisio. The audit process takes an integrated risk based approach to governance, process and management related to modern slavery markers. Once the audit is complete, suppliers receive a report detailing all areas requiring improvement in process or governance. Suppliers are then required, within the set timeline, to provide evidence of actions taken and their impact, demonstrating progress to a Low or Medium risk position. By using these tools, we gain greater visibility into supplier practices, benchmark performance against industry standards, and implement targeted actions to mitigate risk, strengthen governance, and promote sustainable, ethical operations within our supply chain.



Education

Sodexo has provided specialist support to a wide range of clients and UK Government entities, and non profit organisations, including Business In the Community, Department of Justice Northern Ireland and Qinetiq. We continue to offer this expertise to any client or supplier across the UK and Ireland, providing expert guidance on understanding modern slavery, identifying potential risks within organisations and supply chains and managing situations where a victim is identified. Through this work, we aim to equip organisations with the knowledge and tools to take effective action against modern slavery.

Madeline Fitton, Modern Slavery Specialist at Sodexo UK&I, is a contributing member of the Forced Labour Forum with the UK Home Office and was part of the group that refreshed the Transparency in Supply Chains (TISC) guidance in 2025. Madeline presented at the TISC Guidance Launch in April 2025 alongside Jess Phillips, Minister for Safeguarding and Violence Against Women and Girls, and Eleanor Lyons, Independent Anti - Slavery Commissioner. This guidance allows Sodexo to use our work in this landscape to support knowledge sharing and expert strategy to support other businesses to tackle modern slavery.

Leverage

Sodexo continue to Chair the BSA Modern Slavery Council and the Sodexo Sustainability Forum. In 2025, we launched the Ireland Modern Slavery Council. With over 70 members, the Council convenes Government bodies, Agencies, Charities, Academia, EU Commissions and a multitude of private companies across the Irish Economy. Supported by An Garda Síochána we aim to raise awareness, share best practice and drive coordinated action to identify and tackle modern slavery in the region.



The Council is objective based and wants to make a tangible difference by creating exposure for modern slavery, and publishing tools and resources to enable any organisation to battle this risk.

In 2023, the BSA Modern Slavery Council launched and published the BSA Modern Slavery Toolkit which included an overview of the elements all organisations need to be aware of to tackle the risk of modern slavery, including what modern slavery looks like, current victim profiles, where it will appear in your organisation, what a modern slavery statement should include, who needs to be involved in modern slavery mechanisms and what to do when you find modern slavery within your organisation. The toolkit is available as a free download for any organisation through the BSA website.

In 2024, the BSA Modern Slavery Council has continued to achieve its objectives and has launched and published the BSA Modern Slavery Frontline Workers Training Pack. The pack includes a myriad of resources which enable the staff who will be the most likely in an organisation to see modern slavery to be trained, to be supported, to spot the signs of modern slavery and most importantly, to manage a situation where they believe a colleague could be at risk, in a victim centred manner, which will protect the colleague and follow the best route to deal with such a situation. The BSA Modern Slavery Frontline Workers Training Pack is available as a free download for any organisation through the BSA website. The Home Office, Cabinet Office and the GLAA all attended the launch event and the resources included are all superb and can be used freely by any company. We are now discussing who this is shared with through the networks of those involved across the Council including through UK Government channels.

Our principles, policies and approach

Sodexo UK and Ireland's policies reflect our commitment to acting ethically and with integrity in all our business relationships. We are implementing and enforcing effective systems and controls to address and avoid slavery or human trafficking across our business and in our supply chain. The following policies, and supporting guidance, are relevant to slavery and human trafficking, and are available on request:

- Fundamental Human Rights at Work
- Sodexo Charter concerning Fundamental Rights at Work
- Code of Conduct, Business Integrity Guide
- Code of Ethics
- Culture and Belonging policy
- Whistle-blower policy
- Supplier Code of Conduct
- Supplier Governance, and Supply Management policies

Our policies are made available to all on the internal employees intranet. The Fundamental Rights at Work Charter specifically addresses forced labour and is supported by training modules with clear expectations of employees and workers.



Whistle-blower policy

Sodexo UK and Ireland's whistle-blower policy was updated in December 2020 to reference the Modern Slavery Act. This policy now includes our commitment to the elimination of compulsory labour, slavery and human trafficking, as well as providing the facility for employees to raise concerns via a confidential channel.

New employee orientation references Sodexo's policies and is made available to all new starters.

It is the expectation of our employees and workers to maintain certain standards relating to the code of ethics, as well as Sodexo's commitment to guaranteeing that slavery and human trafficking does not take place in any part of our business or supply chain.

All managers are notified of any changes to our policies via an electronic weekly brief. They are required to cascade the updates to all team members who do not have access to the electronic communication channels.

Complaints and concerns raised by employees, whether via the whistle-blower portal or otherwise, are managed and monitored by the Ethics and Compliance Committee. This group is chaired by the CEO, Sodexo UK&I, and consists of the HR Director, CFO, General Counsel, Head of Internal Audit, Director of Risk and Asset Management, Head of Internal Control, Supply Management Director and Segment CEO.

The Committee monitors the status of any matters raised and the actions taken, policies, training and trends. The Committee reports periodically to the Sodexo Limited Board of Directors.

Supplier Code of Conduct

Sodexo requires suppliers to sign up to our Supplier Code of Conduct or to provide evidence that they have a similar code in place governing their organisation.

The Supplier Code of Conduct sets out specific expectations that suppliers avoid and address slavery and human trafficking in their operations and in their own supply chains. The code is reviewed regularly to reflect the changing needs of our business and any fundamental changes to legislation not covered.

In addition, our Code of Practice documents are in place to determine the health, safety, environment and quality standards each supplier must meet prior to engagement with Sodexo.

The Sodexo Safety Management System outlines the requirements for supplier engagement at site level. All suppliers are required to adhere to these standards on a continuous basis as a condition of their supply agreement, and these standards are monitored throughout the duration of the contract.

Suppliers are expected to provide information such as proof of insurance, accreditation and their Health and Safety Policy.

Suppliers are required to demonstrate competence within their particular field of expertise, such as via accreditations to relevant bodies or a demonstration of similar activity with existing clients.

The current Supplier Code of Conduct is available by clicking [here](#).



Due diligence

Sodexo UK and Ireland manages risks across the company through a combination of policies, procedures, training and committees which monitor incidents and report to the Board of Directors. As part of our initiative to identify and mitigate slavery and human trafficking risk, we have in place systems to:

1

Identify and assess potential risk areas in our supply chains.

2

Mitigate the risk of slavery and human trafficking occurring in our supply chains.

3

Monitor potential risk areas in our supply chains.

4

Protect whistle-blowers.





We have zero tolerance to slavery and human trafficking.

To ensure all those in our supply chain and contractors comply with our standards, we have in place a supplier governance programme.

This consists of various elements including:

- A supplier governance team to monitor and govern the contractual relationships Sodexo has with those persons and companies that provide services or supply goods on its behalf. This team works closely with Sodexo's legal department, internal audit and specialist risk experts, to ensure protocols, governance procedures and contractual documents are continuously improved in line with legislative and best practice developments. They also manage effectively any potential risk exposure through the Sodexo supply chain.
- Assessment of supplier suitability is carried out by professionals who are independent from the day-to-day operational management of the suppliers they evaluate. Only those suppliers that achieve a pass will be considered, and where a supplier fails initial assessment, a secondary assessment may be undertaken subject to further discussions with Sodexo's purchasing department and internal audit team.



- Sodexo uses a pre-qualification process in order to assess suppliers against the Supplier Code of Conduct. The level of initial assessment and on-going monitoring relates directly to the products provided or the activity the supplier will be performing and the associated risk. The structure for both the initial and on-going assessment is detailed in governance protocols for both food and non-food suppliers. The supplier pre-qualification process includes questions relating to the Modern Slavery Act and the steps being taken by the suppliers with regards to compliance.

In addition in our internal processes, as mentioned previously, Sodexo have completed an extensive review of the risk assessment and audit process for our supply chain and this is now in the implementation process with the ongoing support of our independent third party expert provider, Verisio.



Assessment and management of our suppliers

Sodexo draws upon external resources and engages with external stakeholders to identify areas where risk may be most significant.

We have a dedicated supplier compliance team with involvement and support from senior management, Internal Audit, HR and Legal. This team ensures that all of Sodexo's supplier contracts include provisions to address modern slavery and human trafficking risk in our supply chain. For all of Sodexo's existing Tier 1 suppliers, this has included implementing updated terms and conditions that will be tracked through the pre-qualification tool. A copy of these terms and conditions is available on request.

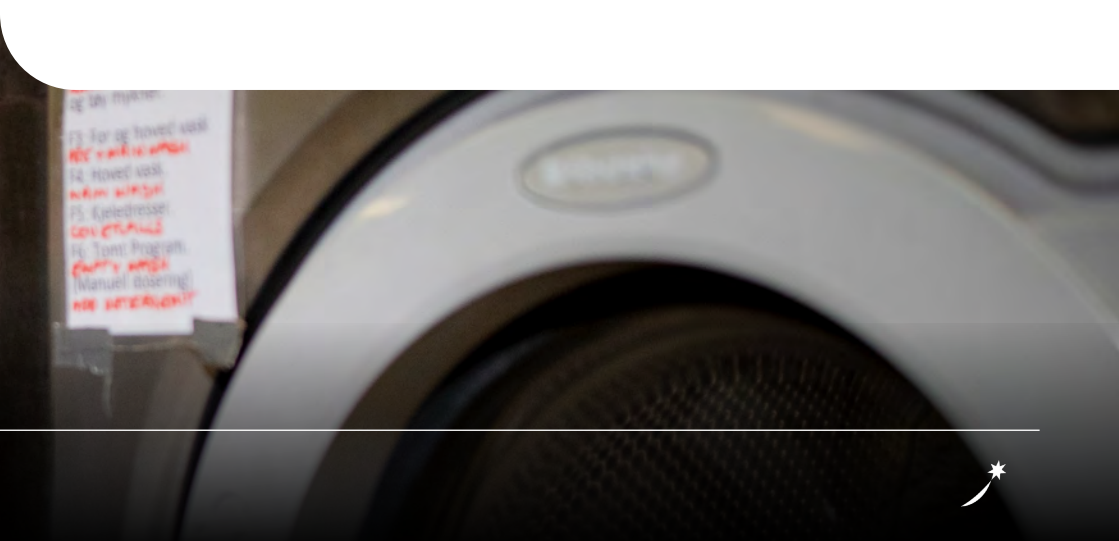


Particular provisions to address this area of risk include:

- Categories of suppliers must provide to Sodexo a slavery and human trafficking statement on a periodic basis;
- Suppliers must maintain and enforce policies and due diligence for their own staff and suppliers;
- Sodexo reserves audit rights; and
- Suppliers must report suspected breaches and must implement training programmes.

In addition to our standard processes, we also partner with Verisio, a leader in the field of social auditing in the UK and Ireland and members of the Association of Professional Social Compliance Auditors, to complete modern slavery audits across our supply chain. The audit is not a one-off event as it is used to create a corrective action plan which is shared with the supplier, who is then supported to remedy areas of concern.

By stipulating warranties, indemnities and termination rights in our supplier contracts, we aim to create a culture of deterrence and compliance in our supply chain.



The Ethics and Compliance Committee and Labour Compliance Forum

To ensure our commitments outlined in this statement remain top of mind throughout our business, we must continuously measure the effectiveness of our approach and provide regular training for our employees.



Effectiveness

These policies are included in annual controls testing performed by the Ethics and Compliance Committee.

Testing includes the areas of ethical values, disciplinary measures, whistle-blowing, fundamental rights at work, reporting and correcting deficient procedures and controls, HR policies and procedures, identifying business risks, definition and review of key performance indicators, supply management engagement with suppliers and sub-contractors, incident reporting process, approval of time worked and authorisation of overtime, screening of employees and buyer conduct.

Test results are reported at regional and group level, including Sodexo Group Internal Audit. Where deficiencies are identified, appropriate remedial actions are raised, and progress monitored and reported to the Regional Leadership Team.



Training

Since 2016, it is required for all Sodexo employees in managerial and supply chain roles to complete the training course on Fundamental Rights at Work.

To date, over 3,500 current employees have completed the course, with the training covering what Fundamental Rights at Work are and why these are so important at Sodexo. Attendees can then apply their knowledge of Sodexo's Charter on Fundamental Rights at Work to their day-to-day roles. This training is required for all new starters in relevant roles.

Our online training platform has been made available to all colleagues since 2023. This provides access to training such as Fundamental Rights At Work to a larger proportion of our workforce.

Completion rates are monitored by the company and we have a reporting process in place to ensure our HR Director is notified if anyone has not completed the training within six months. Employees are required to retake their training exercises every three years.

This Fundamental Rights at Work training is also required for the global supply chain team based in the UK. Additionally, the International Sanctions and High Risk Third Party training has been introduced for relevant colleagues.

The Ethics and Compliance Committee and Labour Compliance Forum regularly reviews the legislative requirements, providing updates to the UK and Ireland Sodexo Limited board, thus ensuring continued executive sponsorship. Progress is monitored by the Risk Management Committee and the Ethics and Compliance Committee.

The team works closely with Sodexo Group representatives to ensure a co-ordinated approach to the topic globally, with a focus on continuing to process, integrate and embed respect for human rights throughout our organisation.



Bright Future Co-Operative

As a signatory to the UN Global Compact, where supporting the rights of people to be free from involuntary or forced labour, Sodexo are proud to have become a member of the Bright Futures Co-operative in 2025 as a deliberate and practical extension of our commitment to preventing, identifying and addressing modern slavery within our operations and value chain.

Bright Future is a not-for-profit co-operative that brings together employers, specialist charities and referral organisations to provide **safe, supported employment pathways for survivors of modern slavery**. Through a trauma-informed and collaborative model, Bright Future enables survivors, who often face significant barriers to work, to access paid work placements that can lead to permanent employment, supported by expert charities during the critical transition period. This approach is designed to reduce the risk of re-exploitation and support long-term independence and dignity for survivors.

**bright
future**
Co-operative



Sodexo recognises that responsible employment plays a critical role in **modern slavery remediation**, not only in preventing exploitation but in enabling recovery where exploitation has occurred. By joining Bright Future, Sodexo is committing to opening up meaningful employment opportunities within our UK workforce, supported by appropriate onboarding, pastoral care and safeguarding measures. This reflects our belief that business has a responsibility to contribute to solutions, particularly where employment practices can either exacerbate or help address vulnerability.

Our membership of Bright Future complements our existing modern slavery approach, which includes risk assessment across our supply chain, supplier engagement and training, participation in cross-sector collaboration, and ongoing awareness-raising with colleagues and partners. While these measures focus on **prevention and due diligence**, Bright Future enables Sodexo to strengthen our approach to **remediation and survivor-centred outcomes**, ensuring our response to modern slavery goes beyond compliance and into meaningful action.

Bright Future's co-operative model also aligns with Sodexo's commitment to collaboration and continuous improvement. The programme brings together over 45 members and specialist charities across the UK, with evidence of strong employment outcomes, including high conversion rates from supported placements to permanent roles. By participating in this network, Sodexo contributes to shared learning on safe employment, inclusive recruitment and ethical labour practices, helping to raise standards across our sector.

Through this partnership, Sodexo seeks to demonstrate that tackling modern slavery requires **both robust systems to prevent harm and proactive action to support recovery**. Our membership of Bright Future represents a tangible step in delivering on our commitment to social justice, ethical employment and the creation of inclusive workplaces where everyone can rebuild their lives with dignity and security.



Looking to the future

Sodexo is a market and thought leader; sharing best practice and encouraging others in the sector and throughout our supply chain to be vigilant and proactive on modern slavery. I'm proud that this work is recognised externally by many organisations, including our ranking in the **World's Most Ethical Companies for 2025**.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.



Jean Renton

Chief Executive Officer
Sodexo UK & Ireland

Approved and signed 27th February, 2026

For and on behalf of the boards of:

Sodexo Global Services UK Limited
Sodexo Holdings Limited
Sodexo Limited
Sodexo Remote Sites Scotland Limited
Sodexo Live UK Limited

**It is of vital importance
to Sodexo that all
suppliers adhere to our
ethical values**



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