



RESPONSIBLE BUSINESS CONDUCT

We are ALL responsible



Speak Up Policy



	Sodexo S.A.	EG-11052026
	Sodexo Speak Up Policy	Release Date: 15 Oct 2018

Introduction

Our employees are committed to the Sodexo values of Service Spirit, Team Spirit and Spirit of Progress, and to the ethical principles that guide us in our day-to-day business. Sodexo is, and must continue to be, a company that employees, consumers, clients and other stakeholders can trust. Those who work for and with Sodexo should always be respected and confident about the integrity of their relationship and engagement with Sodexo.

The policy establishes the standards and procedures in reporting concerns.

The policy also aims at providing a framework to promote responsible and secure speak up by employees and stakeholders without fear of adverse consequences.

This policy covers all employees, consultants, contractors, casual workers and agency workers (hereafter referred to as workers).

In any company, there may be times when an individual may discover or suspect wrongdoing at work.

The aims of this policy are:

- To encourage employees and workers in Sodexo to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously, that appropriate investigation will take place, and that their confidentiality will be respected.
- To provide employees and workers with guidance on to how to raise those concerns.
- To reassure employees and workers that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

There may be instances where this policy are at variance with the local laws of a particular country. Where local law imposes specific standards other than those set out in the present policy, local law will apply. If by contrast the present policy provides a higher standard, it will prevail unless this results in illegal activity.

“Sodexo” means Sodexo S.A.

Who can file a report?

Everyone working for or on behalf of Sodexo can file a report. It is also open to any party with whom our Company 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 can be used to report concerns about suspected business abuses within our Company and in good faith, that is: any violation of the law, our Code of Conduct “Business Integrity Guide” and/or its policies and under which our Company operates.

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Some examples of business abuses include:

- Accounting and audit irregularities
- Bribery or criminal acts
- Conflicts of interest
- Creating/ignoring environmental or safety hazards
- Falsifying company records
- Physical harm
- Theft of cash or goods
- Unauthorized discounts
- Vandalism
- Harassment

A report is considered to be acting “in good faith” when they provide information which they believe is comprehensive, fair and accurate, allowing them to reasonably believe in the truthfulness of the information given, even if it later appears that they were mistaken.

Never investigate the matter yourself and do not seek evidence to build a strong case. We guarantee that no disciplinary measures or other steps will be taken against you if your genuine concern later turns out to be mistaken or misguided.

Sodexo Speak Up is not an emergency hotline or a substitute for contacting law enforcement. The information you submit via this service may not be reviewed immediately. If you are facing a life-threatening emergency or believe you are facing the threat of imminent bodily harm, please contact your local police or emergency responders immediately.

How to file a report

As a general recommendation, the first person to approach when raising a concern is your line manager. You may also choose to discuss your concern with your HR representative, internal auditor or legal counsel.

In case you suspect misconduct and genuinely believe that the matter cannot be dealt with through the available channels, you can use the external Sodexo Speak Up Service. This gives you the opportunity to raise concerns confidentially and in your own language. Sodexo Speak Up 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 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.

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When you file a report please provide as much detailed information as possible to enable a proper assessment and investigation, such as:

- the background, history and reason for the concern,
- names, dates, places and other factual and relevant information,
- any documents that may support your report.

Confidentiality and non-retaliation

Any person who speak ups is protected. Please feel confident that you 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.

You can share your concerns anonymously (where allowed by the laws of your country). We do, however, encourage you to reveal your identity as it is more difficult, and in some circumstances even impossible, for us to investigate reports that are made anonymously.

After you have completed your report (online or by phone) you will receive a unique code called an “access number”. This number can be used to call back or access the Sodexo Speak Up website to check the progress on your report. You will also be able to see whether the person dealing with your report has any feedback or further questions. If you want, you can provide additional information.

Your access number is particularly important if you choose to remain anonymous, as we can only contact you through the website in that case.

Review & investigations



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Review Process

All reports received by Sodexo are logged into a case management system. The report will be first reviewed by the Ethics Department. Then, depending on the nature, urgency and potential impact of your report, the case will be handled by the appropriate department / case manager:

- Ethics Department,
- Audit Department,
- Human Resources Department,
- Health & Safety Department,
- Security Department,
- Legal Department.

All case managers have been formed to receive, review and decide the most appropriate action or remediation regarding a concern or disclosure.

Concerns shall be handled by a case manager unless the allegation is directly against them or is in any way related to the actions of that case manager or overseen by said case manager (e.g. direct reports). In such cases, the concern shall be acted by another case manager.

On the other hand, a case manager can voluntarily step-out or not be involved in the entire process if they deem that a concern shall create a conflict of interest.

The escalation process aims at providing an awareness in order to determine who will handle the investigation and who will be the decision maker regarding the final outcome.

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Escalation level	Escalation description
Tier 2	<p>Group Ethics Officer must be notified of:</p> <ul style="list-style-type: none"> ■ Any legitimate allegations involving the following: COMEX or Regional Leadership member including Senior Leader; ■ Any legitimate allegations of forced labor; ■ Any legitimate allegations of systematic/wide spread corruption or human rights abuse; ■ Any legitimate allegations of bribery; ■ Any legitimate allegations serious threat or damage to public interest; ■ Any legitimate allegations of death or serious bodily harm by a Manager.
Tier 1	<p>Group Ethics Officer and Head of Group Internal Audit must be notified of:</p> <ul style="list-style-type: none"> ■ Any legitimate allegations involving theft or fraud valued at the equivalent of over USD 20,000 / 17,000 EUR.

Reports will undergo an initial review, and if necessary, it will be appropriately investigated. You will be informed of the overall findings, i.e. if Sodexo has established that business abuse has taken place. Please note that we will not be able to give you full details of the outcome of a case (or related actions taken) for reasons of confidentiality, privacy and the legal rights of all concerned.

The reports will be processed within a reasonable timeframe between three and six months, in particular so that the appropriate measures are taken, regardless of the persons concerned.

Investigation Process

Investigations will be conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles (including fair hearing). Details of the case, your identity and the identity of anyone else mentioned in the report, are kept confidential throughout and after the investigation and are only shared on a need-to-know basis.

If you become involved in an investigation, you need to cooperate and answer all questions completely and honestly. Misrepresenting or declaring false information to the investigators of your case as well as delaying, interfering with or refusing to cooperate with an ongoing investigation may lead to disciplinary measures. All parties involved, including the accused, are entitled to confidentiality to avoid unnecessary reputational damages. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

When a report is well-founded (i.e. business abuse has indeed taken place), appropriate measures will be taken where necessary and in accordance with the law and our Policy on Disciplinary Measures.

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If you believe that your concern or a concern raised against you has not been handled appropriately or that an investigation has not been performed correctly, please inform the Group Ethics Officer.

Sodexo Group Ethics Office

255 quai de la Bataille de Stalingrad 92866 Issy-les-Moulineaux Cedex 9 – France

ethics.group@sodexo.com

More information

The Company retains the right to interpret and/or modify this policy at any time to maintain compliance with applicable laws and regulations or accommodate organizational changes within Sodexo Group. This policy is subject to review and approval by Group Ethics Department.

Documents

- Sodexo Code of Conduct “Business Integrity Guide”
- Sodexo Speak Up Data Protection Statement

These Sodexo Statements are available on the Speak Up website.

Contact

If you have questions related to this Speak Up policy or if you need assistance, please contact:

- Your manager, HR representative, internal auditor or legal counsel
- Send an email to ethics.group@sodexo.com

Contact

Sodexo Group Ethics Office
255 quai de Stalingrad 92866 Issy-les-Moulineaux Cedex 9 – France
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