

Sodexo Statement for Fundamental Human Rights at Work

September 2021 – Group Ethics

Since Sodexo's creation in 1966, people have been at the heart of our business model, and meeting their expectations is one of our priorities. Respect for human rights is essential to Sodexo's mission to improve the Quality of Life of our employees and of all whom we serve and to contribute to the economic, social and environmental development of the communities, regions and countries where we operate. Respect for human rights is therefore a pillar of our Responsible Business Conduct commitments.

As a global employer, Sodexo faces a variety of local contexts regarding human rights, and the Group may not always have control over these situations.

Sodexo makes the following commitments regarding human rights:

- Sodexo respects human rights wherever we do business.
- Sodexo seeks to conduct its business in a manner that will not infringe upon the human rights of others, and we will address adverse human rights impacts that result from our business activities.
- Through human rights due diligence, Sodexo will seek to identify, prevent, and mitigate adverse human rights impacts that we may cause or contribute to or to which we may be linked directly by our business relationships.

These commitments are informed by international human rights principles. These principles are set forth in the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Global Compact, to which we have been a signatory since 2003.

In addition, in 2011, Sodexo signed an international agreement framework with the IUF to confirm our commitment to respect Fundamental Human Rights at Work. An appendix on sexual harassment was attached to this agreement in 2017. More recently, in 2021, Sodexo and the IUF signed a declaration of intent reinforcing our mutual commitments and priorities on health and safety in the work environment.

Our workplaces

Sodexo is one of the world's largest employers. These commitments apply to every one of our employees throughout the world. All leaders, executives, and managers are responsible for knowing, abiding by, and communicating our commitments regarding human rights and to embed them in their operations, policies, and practices.

Sodexo expects our teams to observe the following minimum standards for our people working throughout the world:

Safe, healthy and secure workplace

Sodexo embraces a global health and safety culture and seeks to deliver world-class health and safety performance. Sodexo will provide a safe and healthy workplace and working conditions, which comply at a minimum with applicable laws and regulations and will be subject to Sodexo's workplace health and safety program. When Sodexo makes living accommodations available to workers working on our sites, we must take appropriate steps to provide for the employees' physical security and safety and to satisfy the workers' basic needs, including running and potable water, adequate sanitary facilities, some personal space and privacy, a locker for every worker living at the site, respect for all relevant collective building regulations; and clean and safe facilities. Services provided to employees living at the work site, such as laundry, groceries, etc., will be sold at a reasonable price, without making a profit on these services.

Diverse and inclusive workplace

Sodexo is committed to hiring employees based on the criteria of qualifications, competence, experience and other job-related criteria. These criteria also apply to all situations at work, e.g., recruitment, working with a client, selection for a project assignment or a promotion, or termination, and many more.

Sodexo fights against discrimination and is an inclusive employer. We want our diverse workforce to feel good and well-integrated at work. Sodexo seeks to provide to all employees the best possible work-life experience regardless of gender identity, sexual orientation, age, ethnicity, citizenship, race, color, religion, marital status, pregnancy, genetic information, disability, and any other characteristic protected by the law.

Respectful workplace

Sodexo expects all employees to treat each other with decency and respect. This includes ensuring that security and other procedures demonstrate respect for personal dignity and privacy. Sodexo forbids violence in the workplace and any verbal, emotional, psychological, sexual, physical, or other form of harassment, abuse, intimidation, or bullying. Anybody engaging in such behavior will be subject to discipline, including immediate termination.

No forced labor and no human trafficking

Sodexo believes in the elimination of all forms of forced labor and has a zero tolerance for slavery or human trafficking in any part of our business. Therefore, it ensures that everyone is free from forced labor, threats, serious harm or physical restraint and commercial sex; ensures that anyone is free to resign at any time from any kind of work; is loyal and keeps promises about working conditions. In addition, Sodexo prohibits recruitment fees - no one should pay to work for us - and covers all the costs associated with the recruitment process.

No child labour

Sodexo is committed to employing individuals exclusively at least 15 years of age, except in the case of apprenticeships or internships as part of a professional training program. In countries where the legal age is above 15 years of age, Sodexo will respect local laws. Clear age limits for hazardous tasks are set by company policy, and any employment of young workers is subject to any legal limitations regarding hours of work, wages, working conditions, and minimum education.

Freedom of association and collective bargaining

Sodexo is committed to respecting the right of employees to join the union of their choice or not, and to bargain collectively free from any form of retaliation or discrimination. We will bargain in good faith with lawful employee representatives. We will abide by the laws of the countries in which we do business and work within the legal framework of each country to ensure respect for freedom of association and collective bargaining. In countries where the right of association and collective bargaining is restricted under law, we will facilitate the development of parallel means of workers' representation (e.g., meetings, coffee breaks, engagement surveys).

Lawful wages, benefits, and work-time

Sodexo expects that all employees will be paid lawful wages and benefits on a timely scheduled basis for all time that they have worked. Our teams will observe all applicable laws and regulations for working hours for employees, including maximum hour limitations and requirements for break times. Overtime may be required only as permitted by law based upon the nature of the work.

Special concern for migrant employees

Sodexo recognizes the special circumstances of people who travel far from home to work for us, sometimes to other countries. Sodexo will take steps to ensure that these migrant workers are not subject to abuse or denied access to rights as a result of their migration.

Our business relationships

Sodexo will communicate these policies to our clients and suppliers. We expect our business partners to support these policies and their underlying principles. We may engage with our business partners as appropriate to address actual and potential adverse human rights impacts.

Our communities

Sodexo does business throughout the globe. Sodexo seeks to contribute to the development of each of the communities where we operate and to be a responsible citizen of those communities. Our employees, clients, customers, and suppliers live and do business in these communities. We will engage stakeholders in the communities where we do business and seek to develop solutions to concerns about adverse human rights impacts in those communities that may relate to our business activities.

Reporting concerns

We welcome our stakeholders raising concerns about our business practices and their impact on human rights. Meaningful paths for reporting concerns, free from the threat of any retaliation, are especially important for our employees. Likewise, our clients and suppliers and their employees, members of the communities where we operate, and other stakeholders that may be affected by our business must also have means of drawing adverse impacts to our attention.

Sodexo provides an effective mechanism wherever we do business for employees and other stakeholders to raise concerns about infringement of their human rights or other adverse human rights impacts relating to our business. Our Speak Up Ethics Line (www.speakup.sodexo.com) allows everyone to confidentially report activities or behaviors that are contrary to our Code of Conduct or illegal, including breaches of human rights.

Employees may also raise such concerns through lawful collective representatives. All reports should be made in good faith. Any report of suspected human rights infringements or adverse human rights impacts will be carefully reviewed by the Group, within a reasonable timeframe between three and six months, and addressed promptly and appropriately. Individuals making such reports in good faith will not be subject to retaliation, threats, or harassment, and their identity will be held in confidence to the extent possible and as permitted by law.

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

Due diligence and transparency

In addition to addressing concerns raised through individual and collective grievance mechanisms, Sodexo will work proactively to assess actual and potential human rights impacts related to our business and to take appropriate measures to address the risks and impacts that we identify. This process of risk assessment, mitigation, and remediation (including our responses to reported grievances) shall be subject to regular re-view in order to improve its effectiveness and ensure currency.

Sodexo has developed the following People Fundamentals in order to ensure minimum standards that are applied to all employees.

Each “fundamental” is linked to a control and a test plan in order to evaluate and mitigate this risk. Controls are included in our internal control process.

- Safe, secure and healthy workplace
- Respectful workplace relations: no threats, harassment, discrimination, or violence
- Training tools and equipment for competent and safe job performance
- Clear management: job descriptions and objectives
- Respect for fundamental human rights at work
- Full pay: on time every time
- Fair schedules: within legal maximum with proper days off and rest breaks
- Data privacy and security for personal information
- Proper and dignified living accommodations (where provided)
- Voice: meaningful grievance mechanism, free from retaliation to report any violations

Linkage to other policies and practices

As an essential element of Sodexo’s broader commitment to Responsible Business Conduct, this Statement of Respect for Human Rights informs and is supported by the following Sodexo policies, statements, and agreements:

- Sodexo Code of Ethics: Business Integrity Guide
- Sodexo Guide on Fundamental Human Rights at Work
- International Framework Agreement with International Union of Food and Allied Workers (IUF)
- Sodexo-IUF Joint Commitment on Preventing Sexual Harassment
- Sodexo-IUF declaration of intent to reinforce the commitments and priorities on health and safety in the working environment
- Sodexo Global Diversity & Inclusion Guidelines
- Sodexo Supplier Code of Conduct

- Sodexo Human Resources Policies
- Speak Up Ethics line: www.speakup.sodexo.com