

SODEXO GROUP

PUBLIC AFFAIRS GUIDELINES

2021

Introduction

Sodexo is committed to the highest standards of business integrity. The Company does not tolerate any practice that is inconsistent with the principles of honesty, integrity and fairness anywhere in the world where we do business. The values, standards and principles guiding Sodexo's business conduct are explained in the Company's Business Integrity Guide, published on our website (<https://www.sodexo.com>).

To complement the principles set out in the Business Integrity Guide and thereby support its employees engaged in public affairs activities, the Company also has a Public Affairs Policy. That Policy provides guidance to Sodexo employees when interacting with public or government officials (elected official and civil servants).

In line with the group's commitment to transparency, the present Guidelines aim to summarize, to the attention of Sodexo's external stakeholders, the fundamental principles and rules guiding Sodexo's public affairs activities that are included in the Business integrity Guide and the Public Affairs Policy.

Why do we engage with public decision-makers?

Public affairs covers the interactions and efforts in support of engaging with public and government officials (elected people and civil servants).

The objective of public affairs activities is to provide information on our Company and educate elected public and government officials when a legislative or regulatory action could impact our business. It contributes to a better understanding by public officials of Sodexo, its philosophy, its services, and its risks and constraints within the activities it performs.

Lobbying is a normal, acceptable, and useful part of public affairs and the public decision-making process, provided it is conducted in compliance with all applicable legal requirements.

General principles

All Sodexo public affairs activities must comply with the internal Public Affairs Policy and with all applicable local laws and regulations, including being registered with the applicable regulatory agency that monitors lobbying activities, as well as with the Sodexo Business Integrity Guide.

When dealing with government officials, public customers or prospective clients, Sodexo will not give gifts, provide entertainment, or make improper political contributions in order to influence a decision relating to Sodexo, obtain a contract or gain any improper business advantage.

All employee of Sodexo must comply with the Group Gifts, Invitations and Donations Policy applicable in their country, when offering a business courtesy to a public official.

Sodexo respects the regulations in force for the disclosure and use of official documents and does not disclose or use such information in exchange for compensation.

Engaging directly and indirectly with public decision-makers

Sodexo is responsible for any public affairs activity that is conducted on its behalf, either directly by employees or indirectly by intermediaries and professional associations.

- **Directly**

The company has Public affairs teams made up of experts with the necessary skills and knowledge to represent our Company. These experts coordinate advocacy activities and the Public Affairs team works to ensure that all employees have knowledge on applicable laws and regulations governing public affairs activities.

Given the specific nature of some of the company's activities in relation to public procurement law, it is possible for an employee to interact with public officials. If needed, any employee can reach out the local or group Public affairs or legal department. Besides, a Public affairs training module was created to provide guidance on how to engage properly with public-decision makers.

- **Indirectly**

- **Via intermediaries**

Intermediaries are hired to represent the Company under the parameters of a formal contract with Sodexo before undertaking any lobbying activity. All these contracts include provisions requiring compliance with Sodexo's policies and, specifically, the Sodexo Business Integrity Guide.

Intermediaries engaged in a lobbying activity must be registered with the applicable regulatory agency that monitors lobbying activities, to the extent required.

- **Via professional associations**

Sodexo is a member of various professional associations that engage with public decision makers and represent the interests of the industry and its member companies.

Sodexo can provide, when requested, a list of these groups to which Sodexo belongs and with which it interacts on a regular basis.

Sponsoring of political activities

Sodexo respects local laws governing sponsoring of political activities in every country where it operates.

The Company does not financially sponsor any political parties, candidates, or their activities where it is illegal.

Where it is permitted by local law for the purpose of making political contribution, Sodexo will conduct a full review prior to approval of that contribution.

In some countries and in compliance with local laws, Sodexo may create a Political Action Committee (PAC) that employees are free to join. In this respect, every effort is made to ensure that the free will and rights of employees are respected. The PAC is a fund strictly separated from the Company, whose contributions are entirely supported by voluntary donations from eligible employees. The PAC created in the United States will, on occasion and within the limits of the law, make contributions to elected officials and coalitions.

Individual engagement

If Sodexo employees choose to engage in political activity, they must do it on their own time using their own resources and without using the Sodexo name.

Reporting violations (Speak Up)

Sodexo created a dedicated line enabling Sodexo employees and partners to confidentially report activities or behaviors that are contrary to our Business Integrity Guide and these guidelines, or illegal.

Any employee and/or partner can raise their concerns regarding public affairs activities through the Sodexo Speak Up Ethic line.