

A Quality of Life in Business and Beyond

Human Rights & Modern Slavery
Report 2024



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Tackling modern slavery

Sodexo is a people business. Our People are our our greatest asset. Our commitment to them is built on three pillars, Belong, Act, and Thrive. These are three important drivers that we want them to experience as a reality when working at Sodexo. Every day our 29,000 employees across the UK and Ireland strive to develop, manage and deliver a diverse range of services designed to improve the quality of life for our clients, customers and communities.

For us, it all starts with the everyday, we believe that taking action on the concrete things of everyday life can significantly improve the lives of people, communities and the planet.

However, our relationships and responsibilities do not stop at our borders. We are part of Sodexo's global business with a significant supply chain connecting us with over six thousand additional businesses. In support of our contribution to the government's ambition to level up the UK, Sodexo has committed within its social value agenda tangible actions and outcomes that support equity and inclusivity and aim to drive change for individuals and communities. These commitments focus on enabling individuals and our supplier network to thrive by creating access to opportunity through our inclusive, impact focused approach that supports resilience and growth amongst our partner network.

I am proud to be part of a company that shares the same principles as those set out in the Modern Slavery Act of 2015. We believe in the elimination of all forms of compulsory labour and work to ensure slavery and human trafficking does not take place in any part of our business or supply chain. I'm pleased to see the ongoing progress we have made in this area, particularly in light of the challenges created

by the pandemic and impacted by the cost of living crisis impacting so many of our communities.

Sodexo is a signatory to the UN Global Compact and respects human rights, including the right of people to be free from involuntary or forced labour as set forth in the International Bill of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

The risks faced by survivors of modern slavery such as psychological or physical safety, financial status, or digital poverty – which are a serious concern at any time – are compounded as the economy continues to re-open from the Covid-19 pandemic. It is therefore even more critical at this time to ensure that our policies and practices are in place to ensure that employees and those of our supply chain partners are protected and not taken advantage of at this challenging time.

As you will see in this statement, we are showing our commitment to the cause through a range of actions consistent with our position as a world leader in its respect for human rights within our business, supply chain and beyond.

This statement outlines our key commitments across the business, including; our supply chain (page 8), our principles, policies and approach (page 13), our due diligence (page 16), our assessment and management of suppliers (page 20), our effectiveness and training (page 24), and our view looking to the future (page 28).

We must all play our part in upholding human rights and combatting modern slavery. This is why we must be vocal in our commitment to safeguarding the highest standards of ethical conduct across our business and beyond.



Mark Goodyer

Human Resources Director UK & Ireland

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Our global success and performance are founded on our independence, our sustainable business model and our ability to develop and engage our 430,000 employees worldwide

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| 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 53 countries and serving 100 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 430,000 employees worldwide.

Here in the UK and Ireland our employees serve clients in more than 1,951 locations across the corporate, healthcare, schools, universities, sports, leisure and travel, government and energy & 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

Sodexo continues to strive to be industry-leading in the landscape of modern slavery and continues our Tackling Modern Slavery programme through 2023 and into 2024.

The frameworks in place allow us to manage the risks of modern slavery, and this continues to be recognised in the Modern Slavery Assessment Tool score, where we have held a 98% score for the past two years. Additionally, the scoring resulting from the Ecovadis sustainability assessment shows that we retain a ranking in the top 1% of companies globally. We have also been recognised by the Unseen Business Awards, and our Modern Slavery Specialist, Madeline Fitton, was awarded the Individual Impact Award in 2023 and also shortlisted for the CIPS Excellence in Procurement Awards for Sustainable Procurement Champion. Madeline has since been listed in the CPO Strategy Sustainable Procurement Champion Index for 2023.

Through 2023, we have reviewed and refreshed our three year priorities and planning for our modern slavery programme which includes the pillars, Compliance, Education and Leverage. This is incorporated into our refreshed Responsible Sourcing strategy, our Social Impact Pledge and our Better Tomorrow commitments.

Compliance

Our audit regime has always been central to our Tackling Modern Slavery strategy and seeing the reality of audit at a site level rather than paper based solution is something we have intertwined into our audit programme throughout the last three years.

Having worked through a programme of audits for all high and medium risk suppliers previously, we continue to look at the progress from the development plans created as a result of those audits and request reaudit where we feel it is necessary. We also look at significant risk areas as highlighted by the Gangmasters and Labour Abuse Authority, the Global Slavery Index and the International Labour Organisation. We instruct on - site and head office audits where we feel we are at most risk, to ensure our supply chain has the correct controls in place with regards training, governance and structure. This is on both an ad hoc and planned basis, and announced and unannounced, as modern slavery as a crime is continuously morphing and its victim profile and the space where it can be used within each business changes dynamically. We are currently reviewing a further risk and compliance programme with Verisio, to introduce during the next 12 months. Verisio are our third part independent strategic partner, APSCA accredited Modern Slavery audit company.

In addition to this, all suppliers who are registered with Sodexo have to complete our pre-qualification questionnaire (PQQ) process, where we measure our suppliers against modern slavery dynamics, such as the audit process utilised, compliance with the modern slavery act 2015 and modern slavery statement produced by our suppliers, which then enables suppliers to pass the PQQ process to become a supplier to our organisation, this process is via an independent third party Trade Interchange and is ISO9001 accredited.





To supplement these processes and on a global level, Sodexo have rolled out the Ecovadis assessment as a requirement for suppliers who work with us. Suppliers are asked to complete the assessment which incorporates elements of Modern Slavery.

We aim to tackle this issue in as many different mediums as possible, whilst also trying to support our supply chain to manage this risk with our mentoring and training support.

Education

As part of our programme to continue to educate our employees and our networks in modern slavery, we have taken steps forward to make this more accessible.

We are currently developing a module within our Supply Management Academy training which will make Modern Slavery an essential and readily accessible training element for all Global Supply Management colleagues.

We have also recently created new training packages to share with operational colleagues in different territories across UK&I to make this tailored to the regional differences across the region.

Finally, as part of contract management and contract opportunities, we are now offering training mini sessions for suppliers who form the supply chains of contracts where we do not have direct control, to ensure that the risk of modern slavery is understood, and the measures that can be taken to prevent are known and understood.

Leverage

Following on from the success of our Modern Slavery Strategic Supplier Forum, which included four of our key strategic partners and also an SME, we are now expanding this initiative to incorporate all elements of ESG, to ensure we are working with our suppliers in the most efficient way possible and to ensure we replicate the successful processes we put into place in modern slavery across the ESG spectrum

Sodexo chair the BSA Modern Slavery Council, as well as founding the initiative at its inception, and we now have unprecedented support from a myriad of stakeholders in this area. There are now more than 20 member corporate organisations as well as continued support from the Business Services Association, the Cabinet Office and Home Office, with advice and guidance from industry experts including Slave Free Alliance, Hope for Justice, Unseen, Scotland Against Modern Slavery, Stronger Together, Supply Chain Sustainability School and Action Sustainability.

This structure has enabled the Council to make strides forward in our key objectives including the Modern Slavery Toolkit which was launched in June 2023. This publication incorporates 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. Since the toolkit launch, we have had interest from agencies and organisations across the region on our work as the council and how the toolkit can be shared more widely. The Council is an essential part of our work to lead the charge on tackling modern slavery across our market.

Sodexo continue to be a leader in our position on modern slavery and our focus on the active management of modern slavery.



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:

- Sodexo Policy on Human Rights
- Sodexo Charter concerning Fundamental Rights at Work
- Sodexo Statement of Business Integrity
- Code of Ethics
- Equality, Diversity and Inclusion policy
- Whistle-blower policy UK&I
- 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.

A hard copy and electronic employee handbook references Sodexo's policies and is made available to all new starters.

The employee handbook includes a statement confirming 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, European Director of Legal, Head of Internal Audit, Director of Risk and Asset Management, Head of Internal Control, Head of Supply Chain, Reward Manager 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.

We also complete a modern slavery audit on our current supply chain on a rolling basis, and are implementing a requirement for a modern slavery audit for all new suppliers which sit in high and medium risk industries. These will be conducted independently by our social audit partner, Verisio. These checks are supplemental to our standard processes detailed previously.

Sodexo uses central tracking of certification and documentation validity. As supplier qualifications reach their end date, the governance function is prompted to request new documentation from the supplier.

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. For example, Sodexo has appointed two quality assurance/ corporate social responsibility auditors to work with uniform suppliers in Asia. As the textile industry is a potential area of risk, auditors provide an additional level of assurance to ensure suppliers are following Sodexo's Code of Conduct.

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.



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As the largest food supplier to Sodexo, Brakes share many of the same ethical values and in particular strive to eradicate forced labour from the supply chain. In choosing our supply partners their ethical standards are paramount in the decision making process. Sodexo is one of the leaders in the catering industry in this area through its Better Tomorrow Plan – its sustainability strategy - and we are proud to play our part in supporting it through our sourcing strategies.

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Our effectiveness and training

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 has been mandatory for all Sodexo employees in managerial and supply chain roles to complete the training course on Fundamental Rights at Work.

To date, over 2,500 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 mandatory for all new starters in relevant roles.

Our online training platform, Ingenium, is being made available to all colleagues throughout 2023. This will provide 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 mandatory for the global supply chain team based in the UK and mandatory for all

employees in our UK and Ireland Benefits & Rewards business and our Energy and Resources business. Additionally, the International Sanctions and High Risk Third Party training has been introduced for relevant colleagues.

The Ethics and Compliance Committee 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.

Looking to the future

Following a review of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to conduct a periodic review of the measures in place and reflect progress in subsequent annual statements.

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



Sean Haley

CEO
Sodexo UK & Ireland
Director

Approved and signed 6th February, 2024

For and on behalf of the boards of:

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

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

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The Sodexo logo is displayed in a white rounded rectangle. It features the word "sodexo" in a blue, lowercase, sans-serif font. A red swoosh underline is positioned under the "o" and "d", extending to the right. A blue star is placed above the end of the swoosh. A solid red vertical bar is located to the right of the white rounded rectangle.

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