



GENERAL POLICIES	CP-114-2 – PUBLIC INFORMATION FOR NEWS MEDIA POLICY
-------------------------	--

DATE: The date when this policy is posted to the online Company Policy Manual and communicated to all business lines: March 2010

**SUPERSEDES
POLICY DATED:** January 1999; Updated January 2002

SECTION: CP-100 General Policies

TOPIC TITLE: Public Information for News Media

AUTHOR: Corporate Communications Department

PURPOSE: It is the policy of the Company that, in releasing information with corporate implications to print, broadcast and other media, it must "speak with one voice".

SCOPE: All employees in all departments and divisions. This policy is subject to all terms and conditions of the Company Policy Manual.

POLICY: The Company requires that its communication of information with corporate implications to the public and to broadcast media be clear and accurate. Additionally, communication of information with corporate implications must be consistent with the Company's business objectives and brand management. Accordingly, the Company requires that the Corporate Communications department approve, coordinate, and/or issue all communication from or on behalf of the Company. This is applicable regardless of the medium (e.g., electronic, telephonic, print, broadcast, internet-based including blogs and all other forms of online or "social" media). (This may be accomplished through Corporate Communication's pre-approval of communication plans that might involve media outreach, including online or social media.)

The Company's interest in controlling communication with corporate implications includes not only the message, but the mode, timing, and messenger of such information. The Company seeks to ensure that what it communicates publicly is:

- factual;
- not misleading or confusing;
- consistent with corporate objectives and Company interests across all business segment lines;

- in conformance with Company policy;
- in compliance with legal and regulatory requirements;
- accurately reflects the brand;
- presented in the most appropriate form; and
- released in a timely manner through the most appropriate medium and/or messenger.

The Company has a responsibility to provide non-confidential information on Company performance and activities upon request to interested parties, including Sodexo shareholders, security analysts, news media and officials at various levels of government.

The Company also recognizes a responsibility to make sure that the Company's competitive position is not weakened by the release of confidential and proprietary information not required by law and where to do so would be injurious to the Company.

The Senior Vice President and Chief Financial Officer, Senior Vice President and General Counsel and Senior Vice President, Corporate Communications periodically will monitor Company practices and procedures in dealing with confidential information, and will make immediate changes where necessary to help avoid premature or improper release of such information.

RESPONSIBILITIES:

Corporate

Communications:

The Senior Vice President, Corporate Communications is responsible, with approval of the President and Chief Executive Officer, for:

- Establishing policy on general corporate information
- Implementing release of information
- Obtaining clearance from Company operating management and staffs prior to release
- Communicating with the news media

Employee:

Employees are required to be familiar with and comply with this policy.

Management:

It is the responsibility of Company management, including business segment communications personnel, to keep the Corporate Communications department informed about internal activities and external developments, which have or could have public or external implications for the Company. Because of the size, geographic dispersion, and diversity of the Company, and the speed with which news media move, it is especially important that all management bear the responsibility for promptly alerting the Corporate Communications department to emergency situations which could lead to publicity.

Human Resources:

It is the Human Resources representatives' responsibility to be familiar with this policy in order to provide appropriate guidance.

INTERPRETATION: Corporate Communications department, which retain the right to interpret, revise and/or amend this policy at any time, subject to CP-103, Policy on Policies.