

SODEXO INDIA CORPORATE SOCIAL RESPONSIBILITY POLICY

1. ABOUT US

Sodexo's mission is to improve the Quality of Life of our employees and the people we serve and to contribute to the economic, social, and environmental development of the communities where we operate. Our objective is to make each day a better day, yet there is no quality of life, of people if basic needs are unmet.

Supporting the company's Mission and our business strategy is one economic, social and environmental CSR roadmap, titled the Better Tomorrow Plan (BTP). The BTP has relevance to all our activities in India.

CSR is an integral part of the way we do business and specifically we believe in the importance of supporting the most vulnerable people within the communities where we operate by supporting the implementation of best practices and promoting knowledge-sharing to enable equal entitlements and to meet the basic needs.

2. CSR IN INDIA

CSR in India has traditionally been seen as a philanthropic activity. While the corporate houses have been traditionally engaged in doing CSR activities voluntarily, the new CSR provisions put formal and greater responsibility on companies to set out clear framework and process to ensure strict compliance.

The new companies act 2013 (hereinafter referred to as "the Act"), has introduced the idea of CSR to the forefront and through its "Comply-or-Explain" mandate. It mandates qualifying companies to constitute Corporate Social Responsibility Committee to effectively monitor CSR activities of the Company. Further, the Companies (Corporate Social Responsibility Policy) Rules 2014 (hereinafter referred to as "CSR Rules") lays down the framework and modalities of carrying out CSR activities which are specified in Schedule VII of the Act.

3. OBJECTIVE AND FOCUS AREA

3.1 OBJECTIVE:

Sodexo India's CSR policy and objective is to fully implement the Better Tomorrow Plan. Within the plan's framework we articulate who 'We ARE' (our fundamentals, including business integrity), what is it "We "DO" and how "We ENGAGE" with our various stakeholders, as it relates to corporate social responsibility.

The main objective of Sodexo's Better Tomorrow Plan is to align the business CSR activities around a common set of Priorities and Commitments that are important to our various stakeholders.

Our CSR Policy prioritizes key areas that focus on making a positive contribution to society through high impact, programs such as:

- Fighting Hunger and Malnutrition
- Protecting the Environment
- Advocating Health and Wellness solutions
- Supporting Local Communities

This policy covers activities to be undertaken by Sodexo, their alignment with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only. Sodexo proposes to implement its CSR activities in following focus area.

3.2 FOCUS AREA

3.2.1 Food safety, nutritional security and hygiene and sanitation

We believe in the importance of investing in nutrition as accelerator to inclusive opportunity for a healthy growth, and as enabler of better life. At Sodexo we are committed to fight hunger and malnutrition, while addressing food and nutrition determinants of malnutrition through our Stop Hunger initiative. Our objective is to mobilize all of Sodexo's teams and expertise, in concert with our host communities and local partners, and to make a lasting contribution to the fight against hunger and malnutrition.

Malnutrition derives from three main factors which include -

1. Nutritional insecurity with limited access to access to food and low nutritional values;
2. Poor level of food security standards;
3. Inadequate knowledge of hygiene and sanitation practices.

By focusing on the above key areas we aim to improve the well-being of weaker sections of society in urban and rural areas.

3.2.2 Promoting nutrition, health and wellness

To promote health and wellness and to advocate solutions by proposing a wholesome, well-balanced diet. We focus on the relationship between diet, physical activity and health.

3.2.3 Commit to local communities

To support the development of local economies by partnering with associations/ organisations for conducting training programs, promoting local hiring within local communities and people with disabilities. The objective is to empower participants to gain employment with Sodexo and to create employment opportunities for disabled people women and weaker sections of society. We shall also look at empowering Small and Medium Enterprises (SMEs) from the local communities for the purchase of goods and services.

3.2.4 Environment

To reduce environmental impacts our CSR program leverages Sodexo activities to promote sustainable practices that will improve waste management, ensure environmental sustainability, and reduce carbon footprint by promoting green practices, equipment, and solutions.

4 IMPLEMENTATION PROCESS

Sodexo proposes to carry out its CSR activities:

4.1 ON ITS OWN ACCORD

At the operational level we will support interventions which tackle malnutrition through the focus areas mentioned above. Our Stop Hunger actions would aim to leverage all of our employees in the fight against hunger by:

4.1.1 Volunteering

- Hands-on volunteering: hands-on offers a range of activities designed to provide opportunities to make a difference in their community;
- Skills-based volunteering: skills-based volunteering is leveraging the specialized skills of Sodexo's employees to strengthen non-profits organizations, helping them build, improve and sustain their capacity to successfully achieve common goals and impact on society

4.1.2 Servathon

Annual global service event exclusively focused on the fight against hunger and malnutrition. Sodexo employee volunteers and others participate in activities around serving meals, collecting food and fundraising. Servathon would also include supply of food as a measure to provide relief in areas that have faced natural calamities and disaster.

4.1.3 Payroll Giving

Payroll giving program offers its employees the option of donating a portion of their paycheck to raise money to Stop Hunger. It facilitates Sodexo employees to regularly give a small part of their net pay to Stop Hunger.

4.2 THROUGH CONTRIBUTIONS/DONATIONS

CSR Activities of Sodexo shall be carried out through Contributions/Donations made to such other organizations/institutions as may be permitted under the applicable laws from time to time

4.3 THROUGH PARTNERING

CSR Activities of Sodexo shall be carried through partnerships among several stakeholders including NGOs, international organizations, national institutes and like-minded stakeholders. This will facilitate the creation of a platform for stakeholder engagement and enable the partnerships with organizations for innovative approach while sharing practices to positively impact society at large.

4.4. THROUGH THE STOP HUNGER FOUNDATION IN INDIA

Fighting hunger and malnutrition either of above or through the formation of a trust by the name of Stop Hunger Foundation which will be created jointly by all Sodexo companies registered in India.

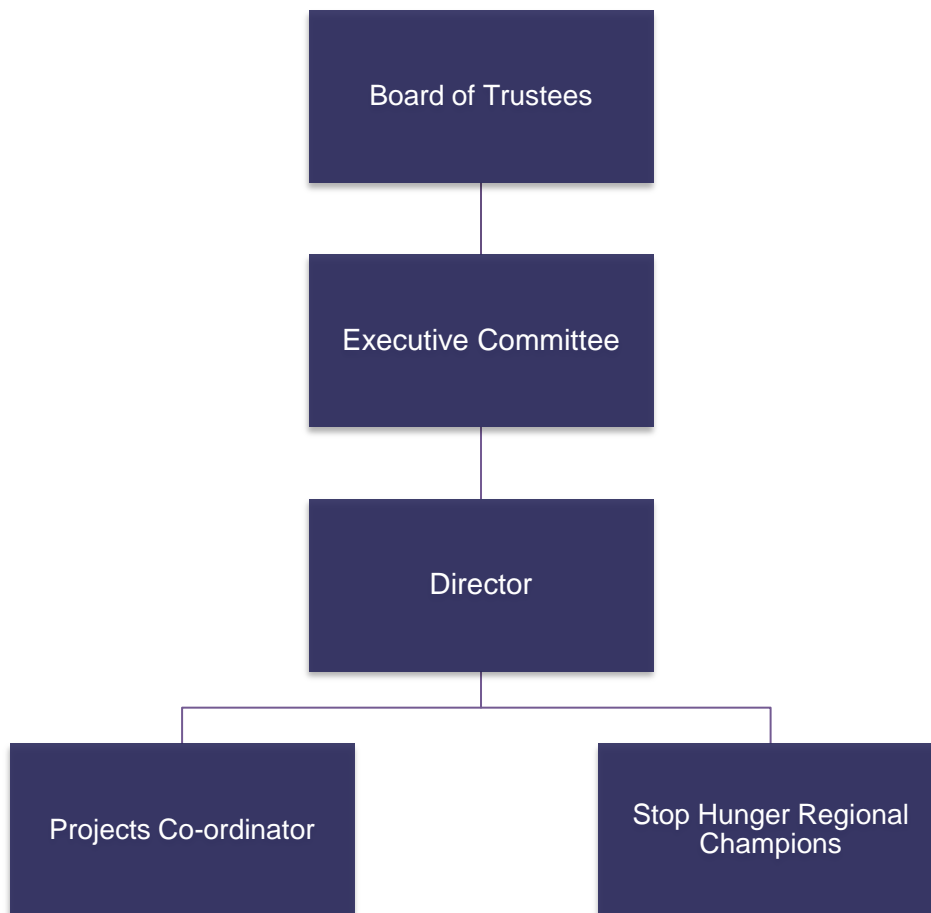
Sodexo aims to support innovative programmes with a participatory and community-oriented approach which would strengthen the involvement and capabilities of the community. We believe in the importance of taking a holistic approach and to fight hunger and malnutrition by tackling the root causes of the malnutrition.

Stop Hunger Foundation will support projects that focus on our intended areas of intervention. Our goal is to facilitate effective and replicable solutions to meet the needs of most vulnerable people. We believe that to positively impact the life of people there is a stringent need to work together with civil society organizations at large, and promote communication among all stakeholders. Socio-political environment is also playing an important role, therefore the need to advocate and share practices among society.

Besides tackling root causes of malnutrition, we aim to share expertise, and to make best practices available to the public at large, and hence to foster a culture of inclusion and continuous innovation. Sodexo would facilitate the sharing of best practices by encouraging the publication of research papers, reviews, evaluation of programmes to communicate in public events.

ORGANIZATIONAL MECHANISM OF STOP HUNGER FOUNDATION AND RESPONSIBILITIES

Trustees shall comprise of at least one member from each CSR Committees of every Sodexo Companies. The Trustees shall allocate leadership responsibilities; ensure the continuity and sustainability of Foundation activities over time, and facilitate the connection between Stop Hunger Foundation and Sodexo business activities. The Executive Committee reviews vision, activities, budgets, and Director performance.



5. EXCLUSIONS FROM CSR

The Following activities shall not form part of the CSR activities of the Company as part of the ACT.

5.1 THE ACTIVITIES UNDERTAKEN IN PURSUANCE OF NORMAL COURSE OF BUSINESS OF THE COMPANY

5.2 CSR PROJECTS/PROGRAMS OR ACTIVITIES THAT BENEFIT ONLY THE EMPLOYEES OF THE COMPANY AND THEIR FAMILIES

5.3 ANY CONTRIBUTION DIRECTLY OR INDIRECTLY TO POLITICAL PARTY OR ANY FUNDS DIRECTED TOWARDS POLITICAL OR POLITICAL CAUSES

5.4 ANY CSR PROJECT/PROGRAMS OR ACTIVITIES UNDERTAKEN OUTSIDE INDIA

6. CSR COMMITTEE

CSR committee shall be formed as per the applicable laws and the committee shall be responsible for the implementation/monitoring and reviewing of this policy and various activities undertaken under the policy. The CSR Committee shall submit periodical reports to the board of directors.

7. CSR BUDGET/CSR SPEND

The Committee shall endeavour to spend at least 2% of the average net profit during the preceding 3 financial years on CSR activities as enumerated above. Any surplus arising out of the contribution made for CSR activities shall not form part of business profit of the Company.

8. POLICY REVIEW & FUTURE AMENDMENT

The Committee shall mutually review its CSR policy from time to time and make suitable changes as may be required and submit the same for the approval of the Board.