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Policy on Human Rights

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What we believe at Sodexo

Sodexo is one of the world's largest employers:

- with more than 350,000 employees
- representing over 132 nationalities
- working on 29,000 sites and in 80 countries.

In the global market place, our business dealings bring us into contact with different social, political, financial, legal and economic systems as well as different cultures, traditions and languages. It is therefore essential for a company such as Sodexo, working in regions throughout the world, to have solid ethical foundations to ensure that Human Rights are respected and business is conducted with irreproachable integrity.



Our strong philosophy is the foundation of our success, both in the past and for our future. It is based on six pillars: who we are, our business strategy — organic growth, our mission, our vision, our core values and our ethical principles.



Our ethical principles are loyalty, respect for people, transparency and refusal to tolerate corrupt practices. All employees at every level are expected to adhere to our philosophy and the six pillars guide each of us in our daily work.

Sodexo commits to respect the principles of:

- the UN Universal Declaration of Human Rights,
- the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- the UN Global Compact:

Global Compact - Human Rights

Support and respect protection of internationally proclaimed human rights

Principle 1 Make sure business is not complicit in human rights abuses

Sodexo's mission is to "Improve the Quality of Daily Life" and we believe we have a responsibility to promote Human Rights in practical ways that relate directly to our business activities and presence.

With more than 350,000 employees working in 80 countries, Sodexo also has a practical interest in encouraging the respect of Human Rights everywhere.



What we commit to at Sodexo

Sodexo is committed to improving the quality of daily life. In practical terms, this is translated into action by:

- addressing Human Rights issues in our own operations and those with whom we do business and,
- contributing to the economic and social development of the cities, regions and countries where we operate.



A formalized policy concerning respect for Human Rights

- Since the time that Sodexo (1966) was founded by Pierre Bellon, Sodexo lives its strong philosophy, its core values and its ethical principles through the daily actions of our more than 350,000 employees.
- In 2003, the Group adopted a formal sustainable development policy committing itself to attain the specific objectives we set with respect to our stakeholders. Sodexo's senior management signed the "Ethical **Principles and Sustainable Development** Contract" charter. committing disseminate and uphold the principles and our core values with our more than 350,000 employees. The Contract has been translated into 14 languages.
- The Board of Directors adopted a Code of Conduct for Senior Managers.
- Sodexo joined the UN Global Compact, committing to respect its ten principles and recognize responsibility for Human Rights, compliance with labor standards and nontolerance of corruption (2003).
- The Executive Committee of Sodexo adopted a Code of Conduct called the Sodexo Statement of Business Integrity (available at sodexo.com). This code enshrines Sodexo's core beliefs and practices with regard to business ethics, to ensure that every employee understands and shares the Group's commitment. (2007)

Sodexo has issued a formal sustainable development strategy backed by a strong commitment to attaining specific objectives set for our stakeholders.



With our employees



Respect for people

Since Sodexo's founding, people have been at the heart of our philosophy. Most of Sodexo's employees are in direct contact every day with our clients and consumers, across 80 countries. Their commitment, expertise, diversity and ability to grow with the business are the foundation on which Sodexo's success has been built over the last 40 years. The wealth of our employee talents – and differences – is our main strength.

Our vision is "to become the premier global outsourcing expert in Quality of Life services." Our "Ambition 2015" is to double the size of our company from its 2005 level.

To achieve our vision, meet our Ambition 2015 objective and to serve 100 millions of consumers, we need to ensure that our human resources are a genuine competitive advantage. We must become a benchmark employer in our ability to attract, develop, engage and retain the best talent and in our commitment to diversity and inclusion.

For Sodexo, a company with a worldwide presence, it is important to listen to people's needs, to establish constructive dialogue in a spirit of trust, and to give each person a sense of dignity in the work place. Sodexo's strategy and

values must be brought to life in a way that also enhances individual goals and aspirations.

We allow each employee to broaden their skills and responsibilities and foster their personal development. We also attach great importance to continually improving our employees' satisfaction with their job. Since its creation, Sodexo recognizes and respects the rights of our employees to unionize, or not to unionize, as they choose.





Encouraging personal growth

Since Sodexo was founded, it has provided a springboard for personal growth. Internal promotion is always favored where a suitable candidate can be found. Each employee has the opportunity of acquiring new skills and responsibilities and achieving personal growth, irrespective of their level in the organization, their qualifications on joining the company, their workplace, or their origin. Satisfying our employees' expectations is one of our main aims.



The better we are at identifying what our employees want, the better we can place them in opportunities within the Group.

We believe in communicating with each other and breaking down barriers. We encourage our people to meet and interact, in a spirit of openness..



Respecting international labor standards

We carry on constructive, direct dialogue with employee representatives, in accordance with the relevant laws in each country. From the outset, Sodexo has always recognized and respected trade union rights.

In North America, Sodexo has positive relationships with a large number of unions. We have over 300 collective bargaining agreements with 35 different unions. We respect our employees' right to organize or not to organize as they may so choose. We continue to negotiate contracts with labor unions in good faith and have a longstanding record of continuing operations without work stoppages. We have engaged in constructive dialogue with unions who have raised issues with the company, and we believe those discussions beneficial have been in dispelling misconceptions about the company, strengthening our union relationships, and enabling us to work constructively to resolve outstanding issues.

In Europe, the European Works Council was established in 1998, and then extended to the new European Union member states in 2004 and again in 2007; it now includes 27 representatives from 22 countries in which Sodexo has operations. Meetings of the Council and of its officers have provided a forum for responding to questions raised by employee representatives about Sodexo's results and future prospects, and for the joint development of a performance report covering issues related to employment, safety at work and gender equality.





Committed to Diversity

Sodexo has a policy covering the issues of discrimination and respect for people. Our policy is to ensure equal opportunity in all aspects of employment regardless of race, color, religion, sex, pregnancy, national origin, ancestry, citizenship, age, marital status, disability, veteran status, sexual orientation, or any other basis protected by law.

We strive to employ and promote the best-qualified person for each position while valuing and promoting diversity within our workforce. We comply with all laws regulating employment decisions. These include, but are not limited to: advertising, recruiting, hiring, placement, promotion, transfer, demotion, compensation, training, layoff or termination, participation in social and recreational functions, and use of employee facilities.

We have a zero tolerance policy for violations of our discrimination, harassment, and/or retaliation policies. Our policies prohibit discrimination, harassment, and/or retaliation against employees based on race, color, religion, gender, gender identity, pregnancy, national origin, ancestry, citizenship, age, marital status, disability, veteran status, sexual orientation, or any other basis protected by law.

Respect for others is at the heart of our business, and diversity and inclusion are built into our mission, core values and ethical principles.

More than simply compliance with basic legislation we are committed to leveraging the diversity of our talent

as a competitive advantage to drive our Group's growth. We strive to be the benchmark in Diversity and Inclusion, to deliver value to our employees, clients and the communities we serve.

Commitment to diversity and inclusion

→ We expect our employees to have the cultural competence to manage diverse teams and to leverage diversity and inclusion in order to ensure full potential at Sodexo.

Promoting cultural diversity

We are promoting cultural diversity not only among employees but also among all our stakeholders such as our suppliers, our clients, our consumers and the communities we serve.

Advancing equal opportunities

→ We are advancing equal opportunities for all our employees regardless of their background or identity.

At the Group level we have articulated four global areas of focus at this time:

- Increase representation of women in senior management.
- · Generations in the workplace
- Ethnic minorities
- People with disabilities.

Individual countries have identified areas of focus that might be relevant to their experiences.



Interacting in a spirit of openness

At Sodexo, we are expanding opportunities to listen to our employees, whose views and ideas are building blocks, helping to ensure that Sodexo remains a progress-oriented company. Complaints are handled fairly and with respect. We believe in open communication and the constant breaking down of barriers.

We encourage our employees to meet and interact in a spirit of openness. At Sodexo, we capitalize on the rich diversity of our employees' talent and cultures by encouraging the exchange of experience and know-how. Cross-disciplinary work groups, international project teams and study trips are among the range of our initiatives designed to generate synergies.





With our suppliers



Promoting ethical sourcing and partnering

To further strengthen our ethical partnerships fostering respect for people and the environment, we ask our suppliers to commit to working with us to contribute to our progress.

Within our business activities, we work to develop trusting, long-term relationships with each of our suppliers to guarantee the quality of our products throughout the supply chain. In addition, we encourage our suppliers to adopt a policy of cultural and social diversity towards their own suppliers.

We issued our **Group Supply Management** policy which aims to formalize a set of corporate rules within which all Supply Management entities should operate, at all levels and in all regions. We also promote our **Group Supplier Code of Conduct** based on ILO (International Labor Organization) standards in every country. This document sets forth Sodexo's desire to work with reliable partners who utilize sound, responsible, ethical and social practices.

We ask suppliers to abide by a code of conduct covering areas including:

- Child Labor.
- Forced Labor,
- Wages And Benefits,
- Working Hours,
- · Health And Safety Guidelines,
- Freedom Of Association.
- Non-Discrimination,
- Disciplinary Practices and Coercion,
- · Community Involvement,
- Ethical Standards

Where our suppliers already have their own code, we require that they comply with our minimum standards.



With our clients



In a spirit of partnership

We work with our clients to enhance and ensure the appeal, reputation and efficiency of their organizations, with a view to offering consumers high quality products and well-adapted solutions in the areas of health and safety.

With integrity

We have a responsibility to maintain the very highest standards in our business practices with our stakeholders. The dissemination of our Business Integrity Statement will help us live our ethical principles and values wherever we are doing business in the world.



With our consumers



Promoting health and well-being

We affect the lives of people many times a day as we serve them, so it's natural that we care about their overall health and well-being, including helping them win the battle with obesity. As one of the leading food services companies, Sodexo supplies a significant part of 50 million people's diet. Sodexo is committed to providing nutritional food to our consumers, and to fostering balanced and healthy eating habits through educational efforts in the communities we serve. The different population segments of the countries in which we are present have different needs, depending upon whether they are composed of young children, adolescents or students, people at work, seniors, patients in hospitals or people with disabilities.



Contributing to prisoners' rehabilitation and the welfare of detainees

Sodexo works closely with correctional facility authorities to design, to build and to manage prisons, young offender institutions, detention centers and post-release rehabilitation hostels. Specialist services are designed to ensure fair and respectful treatment of inmates, satisfactory living conditions, and the provision of training and assistance in finding jobs and housing upon release. Research has shown that these factors can reduce the rate of re-offending by 50%.



Sodexo's Correctional Services activity provides services to Corrections departments in eight countries and under stringent ethical principles, operating only in countries that operate under recognized democratic principles that do not have the death penalty, in which our staff is not required to carry firearms and where the ultimate goal of incarceration is prisoner rehabilitation.



With communities



Contributing to local development

Globalization has enabled many companies to grow through their operations in developing countries; we believe that these companies have a responsibility to ensure that local communities benefit from development opportunities made possible by their presence.

We are committed to supporting the development of local economies by promoting local hiring, the purchase of local products and, in the most disadvantaged countries, local initiatives to stimulate economic growth. We concentrate our efforts on the challenges of supporting self-sustaining opportunities, workforce and employability development, and establishing long-lasting partnerships with local communities.

Working in countries with different cultures, particularly in countries with emerging economies, frequently presents several challenges, including lack of necessary industries, infrastructure and telecommunications. Social or political disturbances can occur in certain countries and we work to encourage respect for religious beliefs, traditions and diversity issues.

Our efforts include:

- Promoting local recruitment and employee development
- Encouraging local procurement and the creation of small businesses
- Supporting local economic initiatives
- Supporting humanitarian efforts in the event of natural disasters, particularly those generating food emergencies.







Operating in "risk zones"

In some areas of the world, formal legal and ethical systems are still developing. Attitudes and practices with regard to Human Rights in what are sometimes referred to as "risk zones" may be very different from countries with mature democratic systems where most of our operations are located.

In risk zone countries where we operate, we work with local stakeholders for the respect of Human Rights.

We also seek to contribute to the evolution and progression of the social environment in the local communities through the positive effects of our presence, our business operations and our participation in local development initiatives.



We comply with any law that may be applicable to our operations in risk zones and Sodexo operates through ethical partnerships intended to develop fair, harmonious relations with local indigenous communities. We are committed to increasing aboriginal employment, assisting business, building individual capacity, enhancing community relations and creating mutual opportunities for aboriginal people and the business community.





FISCAL 2007 HUMAN RESOURCES

More information

The following documents can be downloaded from our website:

www.sodexo.com

• Ethical principles and sustainable development contract 2003

Code of conduct for Senior Managers

• Group Supply Management policy 2007

• Group Supplier Code of conduct

• Sodexo Statement of Business Integrity



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