

SODEXO STATEMENT OF RESPECT FOR HUMAN RIGHTS



February , 2018

Respect for human rights is essential to Sodexo's mission to improve the Quality of Life of our employees and of all whom we serve and to contribute to the economic, social and environmental development of the communities, regions and countries where we operate. Respect for human rights is therefore a pillar of our Responsible Business Conduct commitments.

Sodexo makes the following commitments regarding human rights:

- Sodexo respects human rights wherever we do business.
- Sodexo seeks to conduct its business in a manner that will not infringe upon the human rights of others, and we will address adverse human rights impacts that result from our business activities.
- Through human rights due diligence, Sodexo will seek to identify, prevent, and mitigate adverse human rights impacts that we may cause or contribute to or to which we may be linked directly by our business relationships.

This commitment is informed by international human rights principles. These principles are set forth in the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Global Compact, to which we have been a signatory since 2003.

OUR WORKPLACES

Sodexo is one of the world's largest employers. This commitment applies to every one of our employees throughout the world. All leaders, executives, and managers are responsible to know, abide by, and communicate our commitment regarding human rights and to embed it in their operations, policies, and practices.

Sodexo expects our teams to observe the following minimum standards for our people working throughout the world:

SAFE, HEALTHY AND SECURE WORKPLACE

Sodexo embraces a global health and safety culture and seeks to deliver world-class health and safety performance. Sodexo will provide a safe and healthy workplace and working conditions, which comply at a minimum with applicable laws and regulations and will be subject to Sodexo's workplace health and safety program.

DIVERSE AND INCLUSIVE WORKPLACE

Sodexo does not permit discrimination against employees in hiring, promotion, salary, performance evaluation or any other term or condition of work, on the basis of race, color, national origin, gender, gender identity, sexual orientation, religion, or disability, or any other basis that is prohibited by applicable laws and regulations. Beyond prohibiting discrimination, Sodexo seeks to provide to all employees the best possible work-life experience regardless of age, gender, nationality, culture or personal characteristics, and we have prioritized five core actions: strive to ensure that Sodexo's workforce reflects the diversity of its consumers and clients; recruit, engage, develop and provide accommodations for employees with special needs; expand the representation, engagement and development of women in leadership and operational positions; build awareness and identify new opportunities to increase generational representation and a culture of effective working relationships across generations; and foster an inclusive environment in which Lesbian, Gay, Bisexual and Transgender employees can "bring their whole selves to work."

RESPECTFUL WORKPLACE

Sodexo expects all managers and other employees to treat each other with decency and respect. This includes ensuring that security and other procedures demonstrate respect for personal dignity and privacy. Sodexo forbids violence in the workplace and any verbal, emotional, psychological, sexual, physical, and any other form of harassment, abuse, intimidation, or bullying. Anybody engaging in such behavior will be subject to discipline, including immediate termination.

NO FORCED LABOUR

Sodexo does not permit the use of indentured, slave, bonded or other forced involuntary labor.

NO CHILD LABOUR

No person under the age of 15, or the legal age of employment in any country or local jurisdiction, whichever is higher, may be permitted to work for Sodexo. No minor may be employed to perform hazardous work, and any employment of minors is subject to any legal limitations regarding hours of work, wages, working conditions, and minimum education.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect the rights of our employees to decide whether or not to be represented by a trade union and to bargain collectively. We will not discriminate or retaliate against any employee or employee representative because of affiliation with, support for, or opposition to any union. We will bargain in good faith with lawful employee representatives. We will abide by the laws of the countries in which we do business and work within the legal framework of each country to ensure respect for freedom of association and collective bargaining.

LAWFUL WAGES, BENEFITS, AND WORK-TIME

Sodexo expects that all employees will be paid lawful wages and benefits on a timely scheduled basis for all time that they have worked. Our teams will observe all applicable laws and regulations for working hours for employees, including maximum hour limitations and requirements for break times. Overtime may be required only as permitted by law based upon the nature of the work.

SPECIAL CONCERN FOR MIGRANT EMPLOYEES

Sodexo recognizes the special circumstances of people who travel far from home in order to work for Sodexo, sometimes to other countries. Sodexo will take steps to ensure that these migrant workers are not subject to abuse or denied access to rights as a result of their migration.

OUR BUSINESS RELATIONSHIPS

Sodexo will communicate this policy to our clients and suppliers. We expect our business partners to support this policy and its underlying principles. We may engage with our business partners as appropriate to address actual and potential adverse human rights impacts.

OUR COMMUNITIES

Sodexo does business throughout the globe. Sodexo seeks to contribute to the development of each of the communities where we operate and to be a responsible citizen of those communities. Our employees, clients, customers, and suppliers live and do business in these communities. We will engage stakeholders in the communities where we do business and seek to develop solutions to concerns about adverse human rights impacts in those communities that may result from our business activities.

REPORTING CONCERNS

We welcome our stakeholders raising concerns about our business practices and their impact on human rights. Meaningful pathways for reporting concerns free from the threat of any retaliation are especially important for our employees. Likewise, our clients and suppliers and their employees, members of the communities where we operate, and other stakeholders that may be affected by our business must also have means of calling adverse impacts to our attention.

Sodexo will provide effective mechanisms wherever we do business for employees and other stakeholders to raise concerns about infringement of their human rights or other adverse human rights impacts relating to Sodexo's business. Employees may also raise such concerns through lawful collective representatives. All reports should be made in good faith. Any report of suspected human rights infringements or adverse human rights impacts will be addressed promptly and appropriately. Persons making such reports in good faith will not be subject to retaliation, threats, or harassment, and their identity will be held in confidence to the extent possible and as permitted by law.

DUE DILIGENCE AND TRANSPARENCY

In addition to addressing concerns raised through individual and collective grievance mechanisms, Sodexo will work proactively to assess actual and potential human rights impacts related to its business and to take appropriate measures to address the risks and impacts that we identify. This process of risk assessment, mitigation, and remediation (including our responses to reported grievances) shall be subject to regular review in order to improve the effectiveness and ensure currency. We will report at least annually on our progress.

LINKAGE TO OTHER POLICIES AND PRACTICES

As an essential element of Sodexo's broader commitment to Responsible Business Conduct, this Statement of Respect for Human Rights informs and is supported by the following Sodexo policies, statements, and agreements:

- Sodexo Human Rights Guide for Managers (forthcoming)
- Sodexo Human Rights Guide for Employees (forthcoming)
- Sodexo Statement of Business Integrity
- Sodexo Business Integrity Guide (forthcoming)
- Sodexo Fundamental Rights at Work Charter and Guide
- International Framework Agreement with International Union of Food and Allied Workers (IUF)
- Sodexo-IUF Joint Commitment on Preventing Sexual Harassment
- Sodexo Global Diversity & Inclusion Guidelines
- Sodexo Supplier Code of Conduct