

HUMAN RIGHTS & MODERN SLAVERY REPORT

2020/2021

CONTENTS

| | |
|--|----|
| Introduction: Tackling Modern Slavery | 3 |
| Knowing our business | 4 |
| Our supply chain | 5 |
| Our policies | 6 |
| Due diligence | 8 |
| Assessment and management of our suppliers | 9 |
| Our effectiveness and training | 10 |
| Further steps | 11 |

INTRODUCTION: TACKLING MODERN SLAVERY

Sodexo Benefits and Rewards Services (BRS) UK is a people business who welcomed the UK's Modern Slavery Act 2015 and the duty it places on businesses to publicly disclose the steps they are taking to tackle forced labour and human trafficking. Every day our 240 employees strive to develop, manage and deliver a diverse range of services designed to improve the quality of life for our clients, customers and communities. 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.

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 to ensuring slavery and human trafficking do not take place in any part of our business or supply chain.

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 UN's International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Victims of modern slavery experience some of the most severe breaches of human rights in the world, and the risks today are further compounded by the Covid-19 global health crisis. It is therefore even more crucial at this time to ensure that policies and procedures are in place which protect our global work force as well as everyone who is part of our supply chain.

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 both within our business, supply chain and beyond.

This statement outlines our key commitments across the business, including; our Supply Chain (page 5), our Principles, Policies and Approach (page 6), our Due Diligence (page 8), our Assessment and Management of Suppliers (page 9), our Effectiveness and Training (page 10), and our view Looking to the Future (page 11).

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

Emma Yearwood

Emma Yearwood

Director of Human Resources, Sodexo Benefits and Rewards Services UK



KNOWING OUR BUSINESS

Sodexo (BRS) UK is a subsidiary of the Sodexo Group, and our ultimate parent company is Sodexo SA which has its head office in France. Sodexo is the global leader of services that improve Quality of Life, an essential factor in individual and organisational performance. Operating in 72 countries, Sodexo serves 100 million consumers each day through its unique combination of Benefits and Rewards Services, On-site Services, and Personal and Home Services. Sodexo's success and performance are founded on our independence, our sustainable business model and our ability to develop and engage its 460,000 employees throughout the world.

Here in the UK, Sodexo (BRS) is organised by market sectors (which we call "segments"), supported by service operations and functions.

"Sodexo's success and performance are founded on its independence, its sustainable business model and its ability to continuously develop and engage its 420,000 employees throughout the world."

Sodexo (BRS) UK employs around 240 people and had an annual turnover of £36.4 million. Sodexo (BRS) UK delivers employee benefits and rewards, incentive and recognition programmes, and government services.

Sodexo (BRS) UK is renowned for creating memorable experiences that improve the quality of people's lives. Our services positively impact employee culture, inspire success in the workplace, drive consumer engagement, and transform the way in which employees and consumers behave and perform, meaning they engage more deeply with an organisation.

People are firmly rooted at the heart of everything we do. Our mission is to put our knowledge and expertise to the test. We work with our clients to create the most memorable and impactful outcomes possible – those that generate true and lasting change. We shake up the status quo – we will always ask ‘why’ to make sure we get the best result. Being outcome-led in our approach means our focus is always about what our clients want to achieve; we match their strategic goals to tailored offers and innovative solutions, and then make sure that they achieve (and exceed) their objectives. It means together, we will get the best result for our clients, and that is what matters to us.

We believe in bringing people and business together through creativity and excellent service, with our long-standing mission of improving the quality of life of everyone we work with – and we have over 50 years of experience to back it up. That is what makes us world leaders in employee and consumer engagement.

OUR SUPPLY CHAIN

Sodexo (BRS) UK works in providing reward and benefit services to our clients’ employees, and as such we work with a diverse set of suppliers that are based predominantly in the UK.

We have updated our contracts and are in the process of implementing a new process for on-boarding and managing all suppliers, which includes the introduction of a risk-based categorisation of our suppliers through due diligence checks and the completion of security risk questionnaires. In 2021, we will take further steps by implementing a more rigorous vetting process for all high-risk parties in-line with our global objective to maintain the highest level of corporate integrity and work to remove the risk of modern slavery from our supply chain.

On a global level, Sodexo is working with an expert risk management organisation, Ecovadis, in order to ensure that we are exceeding global legal requirements in our worldwide supply chains as set out in Loi Sapin II, the Devoir de Vigilance (France legislation) and the California Transparency in Supply Chains Act (US legislation).

OUR PRINCIPLES, POLICIES AND APPROACH

Our company policies reflect our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to assess, address and avoid the risk of the occurrence of slavery or human trafficking in our business relationships and supply chains.

We have the following policies and supporting guidance, which are relevant to slavery and human trafficking and available upon request:

- Policy on Human Rights
- Policy and Guide on Fundamental Rights at Work
- Statement and Guide on Business Integrity
- Code of Ethics
- UK Whistleblower Policy
- Supplier Code of Conduct
- Sodexo Anti-Slavery and Human Trafficking Policy

Our policies are made available to our employees during training and via our external website www.sodexoengage.com as well as our internal employee intranet.

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere within our supply chains. Furthermore, the Fundamental Rights at Work Policy and Guide specifically address forced labour, and is supported by training modules with clear expectations of our personnel.

The UK Whistleblower Policy – UK V4 was updated on 1st September 2016 to reference the Modern Slavery Act and the company's commitment to the elimination of compulsory labour, slavery and human trafficking. The policy provides the facility for employees to raise concerns via a confidential channel as set out in Article 6.0 of the Whistleblower Policy – UK V4.

Policy changes are notified via an electronic brief to the management population so that managers can cascade information to all their team members who might not regularly access electronic communication channels.

Complaints and concerns raised by staff, whether via the Whistleblower facility or otherwise, are managed and monitored by the Risk Committee. This Risk Committee is chaired by our Head of Risk and Compliance and comprises of the Chief Executive Officer, the Head of Legal, Head of HR and the Chief Financial Officer.

The Risk Committee monitors the status of any matters raised and follows up on the actions taken, policies, training.

The 'Supplier Code of Conduct documents set out the health, safety, environment and quality standards each vendor must meet prior to engagement with Sodexo. 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 & Safety Policy. They are also required to demonstrate their competence within their particular field of expertise (such as accreditations with relevant bodies or a demonstration of similar activity with existing clients).

Sodexo (BRS) UK requires suppliers to sign up to its Supplier Code of Conduct or supply evidence that they have a similar code in place governing their organisation. This code is reviewed every other year to reflect the changing needs of our business and any fundamental changes made to legislation, the most recent document is available at www.uk.benefits-rewards.sodexo.com/legaland-compliance.

“Our company policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls...”

DUE DILIGENCE

Sodexo (BRS) UK manages risk across the company through a combination of policies, procedures, training and committees which monitor incidents and report to the Executive Committee. As part of our initiative to identify and mitigate slavery and human trafficking risk, we have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Protect whistle blowers
- Impose contractual obligations on our supply chain partners/suppliers

We have a zero tolerance policy to slavery and human trafficking. To ensure that 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:

- Monitoring and governance of the contractual relationships with our suppliers. This work is done with our Head of Legal and Head of Risk and Compliance to ensure that protocols, governance procedures and contractual documents are continuously improved in line with legislative and best practice developments and to manage effectively any potential risk exposure through the Sodexo (BRS) UK supply chain.
- Sodexo (BRS) UK utilises a 'prequalification' process, by complying with our subcontracting policy, in order



to assess suppliers against the Supplier Code of Conduct, and the level of initial assessment and on-going monitoring relates directly to the services the supplier will be performing and its associated risk. The structure for both the initial and on-going assessment is detailed in governance protocols for suppliers. The supplier prequalification process has been updated to include questions relating to the Modern-Day Slavery Act and the steps being taken by the suppliers with regards to compliance.

- A process is being implemented whereby regular checks will be made as supplier qualifications reach their end date the governance function is prompted to request new documentation from the supplier.

ASSESSMENT AND MANAGEMENT OF SUPPLIERS

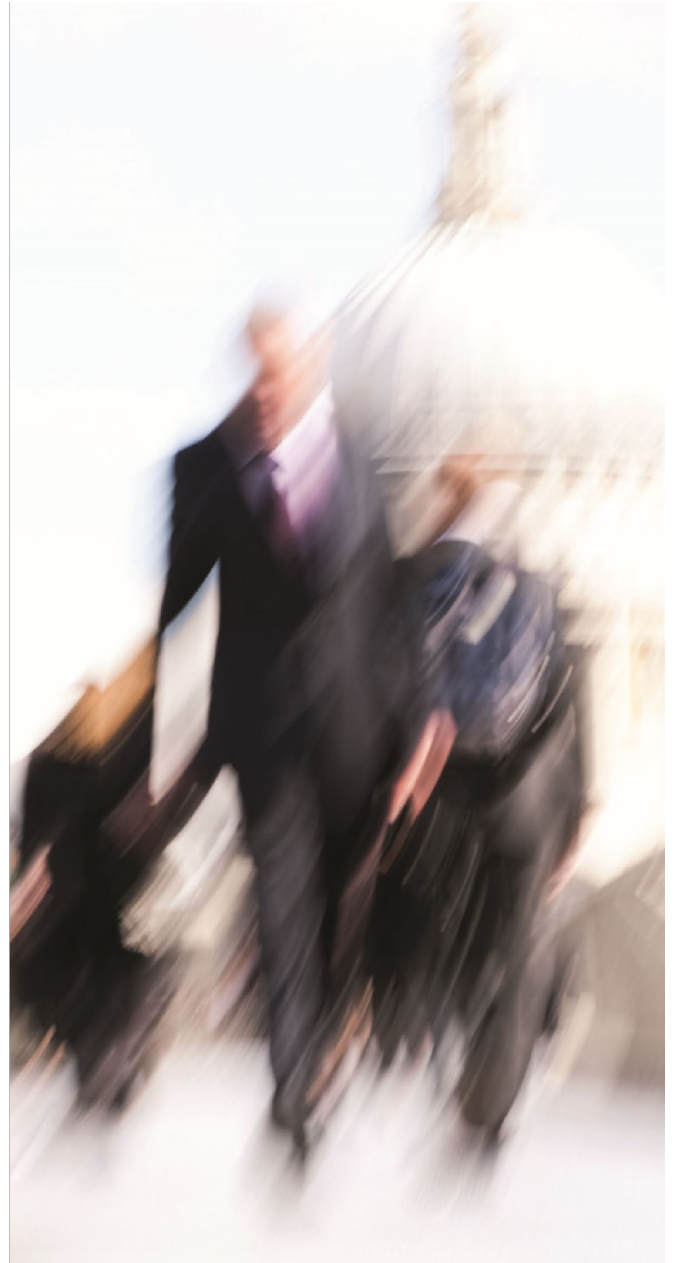
Sodexo (BRS) UK has begun the implementation of its third party controls process, which includes a risk-based categorisation system of all suppliers and centralises our on-boarding process to manage controls such as vetting, contracts, and on-going monitoring. We are constantly drawing upon internal resources and engaging with internal stakeholders to identify areas where risk may be most significant.

As well as monitoring against Modern Slavery, our risk-based approach looks at other areas of concern such as fraud, money laundering, social risk, environmental risk and geographical stability. This risk mapping is designed to enable the purchasing team to concentrate on the areas of risk within the supply chain for that product by highlighting where a significant risk exists.

Sodexo (BRS) UK has reviewed its supplier contracts and implemented new provisions in line with our “no subcontracting without consent” policy to address slavery and human trafficking risk in their supply chains.

Particular provisions in place to address this area of risk include the following.

- Certain categories of suppliers must provide to Sodexo (BRS) UK an annual slavery and human trafficking statement;
- Suppliers must maintain and enforce policies and due diligence for their own staff and suppliers;
- Sodexo (BRS) UK reserves the right to audit;
- Suppliers must report suspected breaches; and
- Suppliers must implement provide training programmes



OUR EFFECTIVENESS AND TRAINING

To ensure the 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 to our employees.

Effectiveness

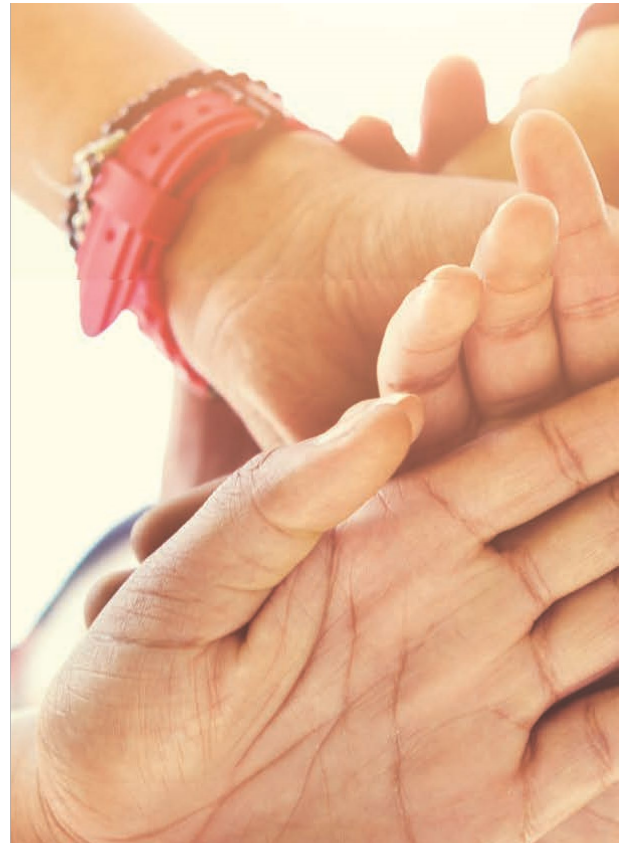
Our policies are included in our annual controls testing completed by our Risk and Compliance team, and our internal control program monitors adherence to company policy.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have published Anti-Slavery and Human Trafficking Policy for our staff.

Further to the Sodexo's annual mandatory modern slavery training programme for all staff, we incorporated this training as an obligatory module for new starters and introduced a reporting process which ensures that the Head of Learning and Development is notified of anyone not completing the training.

The Fundamental Rights at Work training is also mandatory for all employees of Sodexo (BRS) UK, and completion rates are monitored by the HR team.



Our Head of Legal and Head of Risk and Compliance work closely with Sodexo Group representatives to ensure a co-ordinated and consistent approach. They receive regular updates and guidance on group policy, and regularly review the changing requirements of local legislation.

Regular updates on progress are communicated to the CEO of Sodexo (BRS) UK to ensure continued executive sponsorship, and progress is monitored by the senior management.



FURTHER STEPS

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains, we will continue to progress with the implementation of our third party management programme, and will continue to conduct periodic reviews of the measures in place to make sure they are achieving the goals we set out herein above.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st August 2020.

Emma Yearwood
Sodexo Motivation Solutions U.K Limited

31st March 2021