

HR POLICY DOCUMENT

Whistleblower Policy – UK and Republic of Ireland | v11 | 19/09/2023

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1.0 Introduction and Scope

Sodexo UK and Ireland, Sodexo Remote Sites Scotland, Alliance In Partnership Limited, Class Catering Services Limited, and The Contract Dining Company Limited are committed to conducting our business with honesty and integrity, whilst eliminating all forms of compulsory labour and ensuring that slavery and human trafficking does not take place in any part of the business or supply chain. We expect all employees and workers to maintain high standards in accordance with these principles our Code of Ethics and Fundamental Rights at Work charter and associated training.

This policy covers all employees, consultants, contractors, casual workers, and agency workers, (hereafter referred to as workers)

In any company, there may be times when an individual may discover or suspect wrongdoing at work.

Whistleblowing involves raising concerns about wrongdoing, risk, or malpractice that affects others in the workplace, including the public interest, for example fraud or conflicts of interest. In contrast, a grievance relates to how you are personally being treated at work. A grievance

also allows you the right to be accompanied to meetings, requires a formal outcome, and includes the right to appeal. If you've got a personal complaint or concern, for example about how you are being treated at work, the most appropriate route for you to raise a concern is likely to be via our Grievance procedure. You should also refer to our Anti-Bullying and Harassment Policy which contains important information about behaviours at work and guidance on how to raise a complaint depending on the nature of your concern. If you raise a complaint in good faith you will not suffer any negative treatment as a consequence, regardless of the outcome.

The aims of this policy are:

- To encourage employees and workers in Sodexo to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously, and appropriate investigation will take place, and that their confidentiality will be respected.
- To provide employees and workers with guidance as to how to raise those concerns.
- To reassure employees and workers that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy does not form part of the contract of employment and may be amended at any time.

2.0 General Principles

All workers are encouraged to be aware of the importance of preventing wrongdoing in the workplace and raise any concerns under this policy where the disclosure is in the public interest.

Everyone should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

No worker will be victimised for raising a matter under this policy. This means that the continued employment and opportunities for future promotion or training of the employee or continued engagement of the worker will not be influenced or affected by a legitimate concern raised by them.

Victimisation of a worker for raising a concern will be a disciplinary offence.

If misconduct is discovered following any investigation under this policy the Company's disciplinary process will be followed in addition to any appropriate external measures.

If allegations have been made falsely, in bad faith, or with a view to personal gain, Sodexo may take disciplinary action which may lead to dismissal.

An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, workers should not agree to remain silent. They should report the matter to the Sodexo Speak Up Hotline. (See contact details at section 12.0)

3.0 What is Whistleblowing?

Whistleblowing is the disclosure of information (made in the public interest) which relates to suspected wrongdoing or dangers at work. It may include concerns about suspected:

- Criminal activity including money laundering
- Miscarriages of justice

- Danger or creation of risk to health and safety (whether of an employee, worker, client, or the public generally)
- Acts causing damage to the environment
- Failure to comply with legal obligations or regulatory requirements, for example, allowing compulsory labour, slavery and/or human trafficking to take place in any part of the business or supply chain
- Deliberate concealment of any of the above

Disclosure of these acts, if properly made, carries full protection within the law; the right not to be dismissed, subjected to any other detriment, or victimised because of the disclosure. However, Sodexo is keen to support workers in raising any genuine concerns that may be in the public interest. If there are suspected concerns about any of the matters below, we urge workers to raise them within the internal process detailed at section 5.0 'Raising a Concern'.

- Financial fraud, mismanagement, or money laundering
- Corruption and bribery
- Negligence
- Breach of internal policies and procedures (including our Code of Ethics)
- Conduct likely to damage Sodexo's reputation
- Unauthorised disclosure of confidential information

4.0 Who is a Whistleblower?

A whistleblower is a person who raises a genuine concern in the public interest relating to any of the above. If a worker has genuine concerns related to suspected wrongdoing or danger affecting any of our activities, they must report it in line with this policy.

This policy should not be used for complaints relating to personal circumstances such as the way employees may have been treated at work. In those cases, the Company's Grievance policy should be followed.

If workers are uncertain whether something is within the scope of this policy, they should seek advice from the Sodexo Speak Up Hotline (see contact details at section 12.0). The hotline is a free-phone number which gives Sodexo workers a central mechanism to report concerns.

5.0 Raising a Concern

We hope that in many cases workers will be able to raise any concerns at any early stage with their line manager. Together, employees and their manager may be able to agree a way of resolving the concern quickly and effectively. In some cases, a manager may refer the matter to the Sodexo Speak Up hotline themselves. Managers have a responsibility to ensure that this policy is operated correctly so that workers can raise concerns without fear of reprisals.

Where the matter is more serious, for example, a worker is concerned about compulsory labour, slavery and/or human trafficking, an employee feels that their manager has not addressed their concern, or they prefer not to raise it with them for any reason, they should contact the Sodexo Speak Up service or any member of the Ethics & Compliance Committee. Contact details are at the end of this policy.

The Sodexo Speak Up service gives employees the opportunity to raise concerns confidentially via an independent third party and is available 24/7, 365 days a year.

There are two ways in which a report can be submitted through Sodexo Speak Up:

- An employee can file a report online by visiting the Sodexo Speak Up website at www.speakup.sodexo.com
- An employee can file a report via the Sodexo Speak Up Hotline (contact details can be found at section 12.0)

In the case of suspected or known money laundering activity workers must report their concerns using the internal control incident report template. It is important to note that failure to report knowledge or suspicion of money laundering is a criminal offence under the Proceeds of Crime Act 2002 and the Terrorism Act 2000. Furthermore, it is also a criminal offence under the Proceeds of Crime Act 2002 and the Terrorism Act 2000 if a worker is proven to have knowingly prejudiced an investigation by making a disclosure and/ or destroys, conceals, or tampers with evidence relating to an investigation.

In the UK & Ireland, the Sodexo Speak Up service reports any concerns raised to the Ethics & Compliance Committee, the central body which meets regularly to manage concerns raised under this policy.

The Ethics & Compliance Committee is chaired by the UK & Ireland Human Resources Director and comprises of the General Counsel, the Head of Internal Audit, Corporate Responsibility Director, Head of Internal Control, Head of Supply Management, a Segment CEO – appointed for one year in a rotational basis and the CFO or a delegate. Membership of the Committee may be changed by the Board of Sodexo Limited.

From time to time, workers may become aware of concerns through a third party such as a client, regulatory body, or the police. Where such concerns cannot be resolved at an informal level, they should immediately contact the Sodexo Speak Up service (using one of the two reporting options outlined above) or any member of the Ethics & Compliance Committee which will decide on the appropriate route of investigation for all matters referred to it (whether via the Speak Up service or otherwise) to ensure that action is taken wherever appropriate.

While the matter is being investigated, workers are asked to keep all information confidential. Any documentation or potential evidence should be kept in a secure place until a request is received to make this available to the investigator. Nothing should be destroyed, altered or (in the case of computer data) deleted as it may be needed to investigate the matter fully.

6.0 Confidentiality

We hope that all workers will feel able to voice their concerns openly under this policy. However, should anyone wish to raise concerns confidentially; we will make every effort to keep identities a secret. If it is necessary for anyone investigating a concern to know a worker's identity, we will discuss this with them beforehand.

We do not encourage workers to make disclosures anonymously. Proper investigation may be more difficult or even impossible if we cannot obtain further information from someone following a disclosure. It is also more difficult to establish whether any allegations are credible.

Whistleblowers who are concerned about reprisals if their identity is revealed should speak to the Speak Up hotline so that appropriate measures can then be taken to preserve confidentiality.

7.0 External Disclosure

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, workers should not find it necessary to alert anyone externally.

The law recognises that in some cases it may be appropriate for a worker to report concerns to an external body such as the police, a regulatory body, or legal advisor. We do strongly advise workers to seek advice before reporting a concern to anyone externally. The independent whistleblowing charity, Protect, operates a confidential helpline, and has a list of regulators for reporting certain types of concern. (See contact details at section 12.0).

Whistleblowing concerns usually relate to the conduct of our workers, but they may sometimes relate to the actions of a third party, such as a supplier, client, or customer. In some circumstances the law will protect workers if they raise the matter with the third party directly. However, we encourage reporting such concerns internally first. Workers should contact their line manager or the Speak Up Hotline for guidance.

8.0 Investigation and Outcome

Once a concern is raised through the Sodexo Speak Up system, whether via the hotline or the online portal, it will be allocated to an appropriate case manager who will thoroughly investigate the matter. The whistle-blower (unless reported anonymously) will receive acknowledgement that the information has been received and may be required to provide additional information. Any information provided by the Company must be kept confidential.

We will try to deal with concerns fairly and in an appropriate way, using this policy will help us to achieve this. As a result, employees may see changes in day-to-day activity regarding the concerns raised. However, if you see further evidence that the wrongdoing is continuing, you should contact the Ethics & Compliance Committee.

9.0 Protection and Support

We understand that people who raise concerns at work are sometimes worried about repercussions. We encourage openness and will support workers who raise genuine concerns in the public interest under this policy, even if they are mistaken.

Workers will not suffer any detrimental treatment because of raising concerns provided, they reasonably believe that the allegations are true, that the disclosure is being made to the correct person/body, and that the allegations are not made for personal gain. "Detimental treatment" might include dismissal, disciplinary action, bullying, victimisation or threats. Any worker who believes that they have suffered such treatment should inform the UK & Ireland Human Resources Director immediately, who will appoint an appropriate manager to investigate and inform the Ethics & Compliance Committee of this investigation.

Workers must not threaten, bully, harass, or retaliate against whistleblowers, and anyone who is involved in such conduct will be subject to disciplinary action which may lead to dismissal.

A confidential support and counselling helpline service is available to whistleblowers raising concerns under this policy. The helpline details are at the end of this policy.

This policy does not guarantee protection from disciplinary action where the person who has raised the concern is found to have committed the wrongdoing themselves. However, the fact that they have raised an issue may be considered as a significant mitigating factor in any disciplinary proceedings.

Any reports made through the whistleblower policy which are found to have been raised maliciously or in the knowledge that the reports were untrue may result in disciplinary action being taken against the employee in accordance with the Company's disciplinary procedure.

10.0 Responsibility and Reporting

The Board of Sodexo Limited has delegated to the Ethics & Compliance Committee the power and overall responsibility to implement this policy and to review the effectiveness of actions taken in response to concerns raised under it.

The Ethics & Compliance Committee will report periodically to the Board of Sodexo Limited, the Chief Financial Officer of Sodexo and Group Internal Audit.

11.0 Escalation Process

Sodexo will endeavour to escalate all concerns to the appropriate level. The table below sets out the different levels of escalation depending on the nature of the concern.

Escalation Level	Escalation Description
Tier 3	<p>Group Ethics Officer must be notified of:</p> <ul style="list-style-type: none">Any legitimate allegations involving the following: COMEX or Regional Leadership member including Senior Leader.Any legitimate allegations of forced labor.Any legitimate allegations of systematic/widespread corruption or human rights abuse.Any legitimate allegations of bribery.Any legitimate allegations serious threat or damage to public interest.Any legitimate allegations of death or serious bodily harm by Manager.
Tier 2	<p>Group Ethics Officer and Head of Group Internal Audit must be notified of:</p> <ul style="list-style-type: none">Any legitimate allegations involving theft or fraud valued at the equivalent of over £15,000
Tier 1	<p>UK&I Ethics and Compliance Committee members must be notified of:</p> <ul style="list-style-type: none">Any legitimate allegations involving theft or fraud valued at over £10,000

12.0 Contact Details

Sodexo Speak Up Hotline:

0800 111 6387 (UK)
ROI: 1800 851 864

Sodexo Speak Up Website:

www.speakup.sodexo.com

Employee Assistance Programme:

0800 111 6387 UK and Ireland
ROI: 1800 551 556

Protect Whistleblowing Advice Line: 020 7404 6609
Protect General Enquiries: 020 3117 2520

13.0 Document Control

Version	Date	CHRA Owner	Status	Updated from previous Version
Version 1	01/07/2011			Created to accompany the Anti Bribery Policy
Version 1.1	01/02/2012			Clarity on remit covering the Republic of Ireland
Version 1.2	28/03/2012			Employee Acknowledgement Slip Added
Version 2.0	13/05/2013			Reformat for HRTP
Version 3.0	01/10/2013	ERP	Approved	Reformatting
Version 4	25/01/2016	ER and Policy	Approved	General review and update
Version 5	08/12/2017	ERP & Policy	Approved	New phone number added
Version 5a	22/01/2018	ERP & Policy	Approved	Added Sodexo Remote Sites Scotland into scope
Version 6	06/03/2018	ERP & Policy	Approved	Added in anti-money laundering information
Version 7	01/04/2019	ER & Policy	Approved	Inclusion of whistleblowing tool (Speak Up)
Version 8	01/12/2020	ER & Policy	Approved	Updated EAP Provider
Version 9	29/03/2022	ER & Policy	Approved	Updated contact numbers (EAP and Speak Up)
Version 10	13/04/2022	ER & Policy		Updated legal entities to include AiP
Version 11	19/09/2023	Policy Mgr.	Approved	Updated Ethics committee details