



Human Rights and Modern Slavery Report

A Quality of Life in
Business and Beyond

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Tackling modern slavery

Sodexo is a people business. Our people are our greatest asset. Our commitment to them is built on three pillars: Belong, Act, and Thrive. These are three important drivers that we want them to experience as a reality when working at Sodexo. Every day our 29,000 employees across the UK and Ireland strive to develop, manage and deliver a diverse range of services designed to improve the quality of life for our clients, customers and communities.

For us, it all starts with the everyday - we believe that taking action on the challenges of everyday life can significantly improve the lives of people, communities and the planet.

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 five thousand additional businesses. In support of our contribution to the government's ambition to level up the UK, Sodexo has committed within its social value agenda tangible actions and outcomes that support equity and inclusivity and aim to drive change for individuals and communities. These commitments focus on enabling individuals and our supplier network to thrive by creating access to opportunity through our inclusive, impact-focused approach that supports resilience and growth amongst our partner network.

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 work to ensure slavery and human trafficking does not take place in any part of our business or supply chain. I am very encouraged that we continue to be thought leaders in this space and have not stopped driving our strategy.

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

The risks faced by survivors of modern slavery, such as psychological or physical safety, financial status or digital poverty, are a serious concern at any time. It is therefore critical that our policies and practices are in place to ensure that employees and those of our supply chain partners are protected and not taken advantage of.

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 within our business, supply chain and beyond.

This statement outlines our key commitments across the business, including; our supply chain (page 8), our principles, policies and approach (page 13), our due diligence (page 16), our assessment and management of suppliers (page 20), our effectiveness and training (page 22), and our view looking to the future (page 26).

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



Mark Goodyer
Human Resources Director,
Sodexo UK & Ireland





Our global success and performance are founded on our independence, our sustainable business model and our ability to develop and engage our 423,000 employees worldwide

Knowing our business

Sodexo Holdings Limited, Sodexo Limited, Sodexo Remote Sites Scotland Limited and Sodexo Global Services UK Limited are subsidiaries of our parent company Sodexo S.A., which is headquartered in France.

Operating in 45 countries and serving 80 million consumers every day, our global success and performance are founded on our independence, our sustainable business model and our ability to develop and engage our 423,000 employees worldwide.

Here in the UK and Ireland our employees serve clients in more than 2,000 locations across the corporate, healthcare, schools, universities, sports, leisure and travel, government and energy & resources sectors.

We deliver more than 100 services across the region ranging from catering, cleaning, reception, and accommodation to asset management, security, laboratory and grounds maintenance services, enabling our clients to focus on their core business.



Our supply chain

Sodexo pledged in our 2023 statement to complete a periodic review of the measures in place as part of our Tackling Modern Slavery strategy and, in 2024, we have completed an entire review of all elements across Compliance, Education and Leverage.

Sodexo leads the industry in this field, but given the ability of modern slavery to morph and change, we strive to adapt our approach to identify and measure threats of modern slavery in our organisations and supply chains. We do this through our continued relationships with NGOs and expert organisations in modern slavery, and continued monitoring of information and intelligence from organisations such as the Gangmasters and Labour Abuse Authority.

Sodexo has now held a Modern Slavery Assessment Tool score of 98% for over three years and we sit in the Top 2% of companies worldwide on the Ecovadis Sustainability Assessment. Sodexo has also been recognised as one of the **World's Most Ethical Companies for 2024**.



The Compliance element of the Sodexo Tackling Modern Slavery strategy is critical to our due diligence for modern slavery and in 2024, Sodexo completed a thorough review of the risk assessment process for our supply chain and looked at how we can be even more granular in our approach looking cross tier of supply at upstream and downstream levels. Sodexo has also worked with its expert partner, Verisio, to review the supplier base audit process and how this can be developed further to increase the scrutiny on our supply chain and do this in a way that provides support and understanding to our supply chain and the reasons for audit and the process being undertaken. This has resulted in a new format of audit which is at final stages of agreement, a new format of reporting which has been created by Verisio, and a brand new governance process internally to manage the results of the inspections we complete. Verisio is our third party independent strategic partner, an APSCA - accredited social audit provider.

At the same time, Sodexo has continued to complete spot on site audits and manage the results of corrective action plans to further understand our supply chains in a wider range of categories.

In addition to this, we continue to ensure all suppliers who are registered with Sodexo has completed our pre-qualification questionnaire (PQQ) process, where we measure our suppliers against modern slavery dynamics, such as the audit process utilised, compliance with the Modern Slavery Act 2015 and modern slavery statement produced by our suppliers, which then enables suppliers to pass the PQQ process to become a supplier to our organisation. The Sodexo process is completed via an independent third party Trade Interchange, and is ISO9001 accredited. We also complete a thorough check of all companies who work with Sodexo against a risk profile which is governed by our internal Risk team and is also supported by the Sodexo Ethics and Compliance Committee.



In addition, Sodexo continues to support our supply chain partners to participate in the Ecovadis Sustainability Assessment, which allows organisations of any size to understand and manage the risk within their business ecosystem.

Education

To build on our internal training on modern slavery risk in supply chains, Sodexo has also completed training for the supply chains of our customer network across the UK, and we offer this for any client across the UK to provide expert guidance on what modern slavery is, where it may be found and how to manage a situation where a victim is identified within their organisations or supply chains.

Our internal modern slavery risk training for Supply Management and Operations colleagues (which is supplemental to the Fundamental Rights at Work Training completed centrally) will be refreshed in the coming months and, through the work of Madeline Fitton, Modern Slavery Specialist at Sodexo, who is the Chair of the Business Services Association (BSA) Modern Slavery Council, we will be using the recently launched BSA Modern Slavery Frontline Workers Training Pack to support our internal colleagues, and also to share with all organisations that we can, across our business and supply chains.

Leverage

Sodexo takes pride in being thought leaders in partnering and sharing our expertise and has done this through the Sodexo Sustainability Forum which includes a myriad of stakeholders from clients to suppliers and experts across the Environmental, Social and Governance (ESG) spectrum.

Sodexo also continues to Chair the BSA Modern Slavery Council, which was founded by Madeline Fitton, Modern Slavery Specialist at Sodexo, in 2021. The BSA Modern Slavery Council now has over 30 member organisations and continues to build support and relationships across the Modern Slavery landscape including the BSA, Cabinet Office and Home Office, as well as the Gangmasters and Labour Abuse Authority (GLAA), Slave Free Alliance, Hope 4 Justice, Stronger Together, Unseen and Supply Chain Sustainability School.



The Council is objective based and wants to make a tangible difference by creating exposure for modern slavery, and publishing tools and resources to enable any organisation to battle this risk.

In 2023, the BSA Modern Slavery Council launched and published the BSA Modern Slavery Toolkit which included an overview of the elements all organisations need to be aware of to tackle the risk of modern slavery; including what modern slavery looks like, current victim profiles, where it will appear in your organisation, what a modern slavery statement should include, who needs to be involved in modern slavery mechanisms and what to do when you find modern slavery within your organisation. The toolkit is available as a free download for any organisation through the BSA website.

In 2024, the BSA Modern Slavery Council has continued to achieve its objectives and has launched and published the BSA Modern Slavery Frontline Workers Training Pack. The pack includes a myriad of resources which enable the staff who will be the most likely in an organisation to see modern slavery to be trained, to be supported to spot the signs of modern slavery and most importantly, to manage a situation where they believe a colleague could be at risk, in a victim centred manner, which will protect the colleague and follow the best route to deal with such a situation. The BSA Modern Slavery Frontline Workers Training Pack is available as a free download for any organisation through the BSA website. The Home Office, Cabinet Office and the GLAA all attended the launch event and the resources included are all superb and can be used freely by any company. We are now discussing how this is shared through the networks of those involved across the Council including through UK Government channels.

Our principles, policies and approach

Sodexo UK and Ireland's policies reflect our commitment to acting ethically and with integrity in all our business relationships. We are implementing and enforcing effective systems and controls to address and avoid modern slavery or human trafficking across our business and in our supply chain. The following policies, and supporting guidance, are relevant to slavery and human trafficking, and are available on request:

- Sodexo Policy on Human Rights
- Sodexo Charter concerning Fundamental Rights at Work
- Sodexo Statement of Business Integrity
- Code of Ethics
- Equality, Diversity and Inclusion policy
- Whistle-blower policy UK&I
- Supplier Code of Conduct
- Supplier Governance, and Supply Management policies

Our policies are made available to all on the Sodexo internal intranet. The Fundamental Rights at Work Charter specifically addresses forced labour and is supported by training modules with clear expectations of employees and workers.



Whistle-blower policy

Sodexo UK and Ireland's whistle-blower policy was updated in December 2020 to reference the Modern Slavery Act. This policy now includes our commitment to the elimination of compulsory labour, slavery and human trafficking, as well as providing the facility for employees to raise concerns via a confidential channel.

A hard copy and electronic employee handbook references Sodexo's policies and is made available to all new starters.

The employee handbook includes a statement confirming the expectation of our employees and workers to maintain certain standards relating to the code of ethics, as well as Sodexo's commitment to guaranteeing that slavery and human trafficking does not take place in any part of our business or supply chain.

All managers are notified of any changes to our policies via an electronic weekly brief. They are required to cascade the updates to all team members who do not have access to the electronic communication channels.

Complaints and concerns raised by employees, whether via the whistle-blower portal or otherwise, are managed and monitored by the Ethics and Compliance Committee. This group is chaired by the COO, Sodexo UK&I, and consists of the HR Director, CFO, General Counsel for UK&I, Ethics and Data Protection Counsel, Head of Internal Audit, Director of Risk and Asset Management, Head of Internal Control, Director of Supply Management, Reward Manager and a Segment CEO.

The Committee monitors the status of any matters raised and the actions taken, policies, training and trends. The Committee reports periodically to the Sodexo Limited Board of Directors.

Supplier Code of Conduct

Sodexo requires suppliers to sign up to our Supplier Code of Conduct or to provide evidence that they have a similar code in place governing their organisation.

The Supplier Code of Conduct sets out specific expectations that suppliers avoid and address slavery and human trafficking in their operations and in their own supply chains. The code is reviewed regularly to reflect the changing needs of our business and any fundamental changes to legislation not covered.

The Sodexo Safety Management System outlines the requirements for supplier engagement at site level. 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 and Safety Policy.

Suppliers are required to demonstrate competence within their particular field of expertise, such as via accreditations to relevant bodies or a demonstration of similar activity with existing clients.

The current Supplier Code of Conduct is available by clicking [here](#).



Due diligence

Sodexo UK and Ireland manages risks across the company through a combination of policies, procedures, training and committees which monitor incidents and report to the Board of Directors. As part of our initiative to identify and mitigate slavery and human trafficking risk, we have in place processes to:

1

Identify and assess potential risk areas in our supply chains.

2

Monitor potential risk areas in our supply chains.

3

Protect whistle-blowers



We have zero tolerance to slavery and human trafficking.

To ensure 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:

- A supplier governance team to monitor and govern the contractual relationships Sodexo has with those persons and companies that provide services or supply goods on its behalf. This team works closely with Sodexo's legal department, internal audit and specialist risk experts, to ensure protocols, governance procedures and contractual documents are continuously improved in line with legislative and best practice developments. They also manage effectively any potential risk exposure through the Sodexo supply chain.
- Assessment of supplier suitability is carried out by professionals who are independent from the day-to-day operational management of the suppliers they evaluate. Only those suppliers that achieve a pass will be considered, and where a supplier fails initial assessment, a secondary assessment may be undertaken subject to further discussions with Sodexo's purchasing department and internal audit team.



- Sodexo uses a pre-qualification process in order to assess suppliers against the Supplier Code of Conduct. The level of initial assessment and on-going monitoring relates directly to the products provided or the activity the supplier will be performing and the associated risk. The structure for both the initial and on-going assessment is detailed in governance protocols for both food and non-food suppliers. The supplier pre-qualification process includes questions relating to the Modern Slavery Act and the steps being taken by the suppliers with regards to compliance.

In addition to our internal processes, as mentioned previously, Sodexo has completed an extensive review of the risk assessment and audit process for our supply chain and this is now in the implementation process with the ongoing support of our independent third party expert provider, Verisio.



Assessment and management of our suppliers

Sodexo draws upon external resources and engages with external stakeholders to identify areas where risk may be most significant.

We have a dedicated supplier compliance team with involvement and support from senior management, Internal Audit, HR and Legal. This team ensures that all of Sodexo's supplier contracts include provisions to address modern slavery and human trafficking risk in our supply chain. For all of Sodexo's existing Tier 1 suppliers, this has included implementing updated terms and conditions that will be tracked through the pre-qualification tool.



Particular provisions to address this area of risk include:

- Categories of suppliers must provide to Sodexo a slavery and human trafficking statement on a periodic basis;
- Suppliers must maintain and enforce policies and due diligence for their own staff and suppliers;
- Sodexo reserves audit rights; and
- Suppliers must report suspected breaches and must implement training programmes.

In addition to our standard processes, we also partner with Verisio, a leader in the field of social auditing in the UK and Ireland and members of the Association of Professional Social Compliance Auditors, to complete modern slavery audits across our supply chain. The audit is not a one-off event as it is used to create a corrective action plan which is shared with the supplier, who is then supported to remedy areas of concern.

By stipulating warranties, indemnities and termination rights in our supplier contracts, we aim to create a culture of deterrence and compliance in our supply chain.



Our effectiveness and training

To ensure our 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 for our employees.



Effectiveness

These policies are included in annual controls testing performed by the Ethics and Compliance Committee.

Testing includes the areas of ethical values, disciplinary measures, whistle-blowing, fundamental rights at work, reporting and correcting deficient procedures and controls, HR policies and procedures, identifying business risks, definition and review of key performance indicators, supply management engagement with suppliers and sub-contractors, incident reporting process, approval of time worked and authorisation of overtime, screening of employees and buyer conduct.

Test results are reported at regional and group level, including Sodexo Group internal audit. Where deficiencies are identified, appropriate remedial actions are raised, and progress monitored and reported to the Regional Leadership Team.



Training

Since 2016, it has been mandatory for all Sodexo employees in managerial and supply chain roles to complete the training course on Fundamental Rights at Work.

To date, over 3,500 current employees have completed the course, with the training covering what Fundamental Rights at Work are and why these are so important at Sodexo. Attendees can then apply their knowledge of Sodexo's Charter on Fundamental Rights at Work to their day-to-day roles. This training is mandatory for all new starters in relevant roles.

Our online learning platform, is available to all colleagues and provides access. Training such as Fundamental Rights At Work to a larger proportion of our workforce.

Completion rates are monitored by the company and we have a reporting process in place to ensure our HR Director is notified if anyone has not completed the training within six months. Employees are required to retake their training exercises every three years.

This Fundamental Rights at Work training is also mandatory for the global supply chain team based in the UK and mandatory for all employees in our Energy and Resources business. Additionally, the International Sanctions and High Risk Third Party training has been introduced for relevant colleagues.

The Ethics and Compliance Committee regularly reviews the legislative requirements, providing updates to the UK and Ireland Sodexo Limited board, thus ensuring continued executive sponsorship. Progress is monitored by the Risk Management Committee and the Ethics and Compliance Committee.

The team works closely with Sodexo Group representatives to ensure a co-ordinated approach to the topic globally, with a focus on continuing to process, integrate and embed respect for human rights throughout our organisation.



Looking to the future

In 2023, Sodexo committed to a periodic review of our processes and measures and we have completed a full review in 2024.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.



Jean Renton

Chief Operating Officer
Sodexo UK and Ireland

Approved and signed 28th February, 2025

For and on behalf of the boards of:

Sodexo Global Services UK Limited
Sodexo Holdings Limited
Sodexo Limited
Sodexo Remote Sites Scotland Limited



**It is of vital importance
to Sodexo that all
suppliers adhere to our
ethical values**



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