

RESPONSIBLE BUSINESS CONDUCT

February, 2018

Sodexo's Statement of Responsible Business Conduct

Sodexo's mission is to improve the Quality of Life of our employees and all whom we serve; and to contribute to the economic, social and environmental development of the communities, regions and countries where we operate. This mission informs our values of Service Spirit, Team Spirit, and Spirit of Progress, and our core ethical principles. Fundamental commitment to business integrity and respect for human rights and the environment have been central to our values and our ethical principles, and essential to fulfilling our mission, since our founding in 1966.

Our approach and action concerning Responsible Business Conduct is guided by the following:

- **Sodexo Statement of Business Integrity**
- **Sodexo Statement of Respect for Human Rights**
- **Sodexo Corporate Responsibility Roadmap**

These statements, and the commitments to Responsible Business Conduct that they comprise, apply to all of our employees, operations, and business relationships world-wide. All Sodexo leaders, executives, and managers are responsible to know, abide by, and communicate our Responsible Business Conduct commitments and to integrate them into our business policies, practices, and relationships. We also expect our business partners to support and act upon these commitments.

We welcome feedback concerning our business practices. We encourage our employees and other stakeholders to bring to our attention observations or concerns they may have about unethical business practices, adverse human rights impacts, or any other matters related to our Responsible Business Conduct. We therefore commit to provide meaningful pathways by which employees, persons in our supply chains, and other persons touched by our business may raise such concerns free from the threat of retaliation. We also respect the rights of employees to raise such concerns through lawful collective representatives.

We will seek to address promptly every report that we receive. Based upon our investigation of the facts and circumstances, we will take affirmative steps to remediate the circumstance and mitigate risks of recurrence.

Our commitment is continuous and dynamic. We will review our policies and practices routinely in light of what we learn through our own due diligence and through reports that we may receive regarding our business practices or adverse impacts that may result from our business activities. This continuous review will inform the development and enhancement of systems and processes, including due diligence methods, and our prioritization of areas of concern and efforts to mitigate identified risks.

We will report at least annually on actions and outcomes relating to our Responsible Business Conduct.