

The Sodexo Business Abuse Employee Hotline – Call Protocols

Hotline Vendor - The Network, Inc.

We have established with the Network, Inc., a toll-free 800 number (servicing North America). This is a dedicated 800 number for Sodexo and is published via poster and brochures and is available to all Sodexo employees, clients and customers.

As of May 8, 2006, via the Vendor's product enhancements, Sodexo call records are maintained on a secure, web-based Case Management System called "Netclaim".

The Network, Inc. "Interview Specialist" receives calls made to the Sodexo Hotline. From this call, the Interviewer creates an "Incident Report". Each report is assigned a 9 digit case number, and the detailed report is created as a PDF file. The PDF file is immediately entered into the Netclaim system and an email alert is sent to the Sodexo Hotline Manager. Within the Netclaim system, each call with its unique case number has a call summary, new case log, an established case log, file attachment, callback or message log and an outcome and disposition log. Each entry into the Netclaim system is automatically date and time stamped and the author's name is recorded.

The Sodexo Hotline Manager has company-wide access to all calls. Once the call is entered into the Netclaim system, the Hotline Manager reads each call to determine call content and the assignment of the report to the proper investigator. Calls are assigned to the respective Sodexo division Human Resources Professional (note: depending on incident type and degree of allegations, a copy or an alert of the same call may be sent to Sodexo Legal, Corporate Compliance Audit, Corporate Security and/or the Safety and Health departments).

Notice of new call:

The Sodexo Human Resource Professional as the authorized "Investigator" receives an "email link" from the Hotline Manager. The link includes the specific 9 digit call number and provides the investigator with direct access to the call within the web-based Case Management (Netclaim) system. Each Sodexo Human Resources Investigator, has a unique system password and can view and manage only cases that have been assigned to them.

Expectation for Response Time:

- **Excluding the anonymous call, every effort should be made to make "first-time" contact with an identified caller within 2 business days of receiving a Network call.** This first contact is an opportunity to gain additional information/clarification and more importantly to validate the integrity of the program to the caller and perhaps prevent a "call-back". Additionally, with this first Human Resource review and counsel, many calls will be resolved during this

initial contact with the caller. Please make sure that you document the conversation that you have with the caller in the call log or if you cannot reach the caller, document the steps you have taken to make contact (I.E. phone calls, e-mails, letter to residence).

- Every effort should be made to bring resolution to an open call as soon as possible. Contact or an update should be provided (where possible) to the caller and notes entered into the case management system within 2 weeks from the call date.
- Withstanding special circumstances (further investigation, referral to Legal, Security, Audit or Safety and Health departments), final response and closure will be required no later than 30 days from receipt of call. An “open over 30 days” report will be generated and forwarded to each investigator when applicable and a report of calls “open over 90 days” will be sent to the investigator’s direct supervisor, Division’s HRVP or their designated representative requesting follow up.

Closing a call

Once the Sodexo Human Resources Investigator has completed their investigation, all findings including interview notes, counseling documentation, etc., are entered into the Netclaim case management system - case log. In addition, the investigator must select an appropriate outcome and disposition as a result of the investigation and the call is designated as “**Send for Approval**” by clicking on the drop down menu at the top of the case management file under “Action”.

Receipt and Sufficiency of call response:

The Sodexo Hotline Manager receives an email alert for every case “Sent for Approval”. Each call’s case log is then reviewed by the Hotline Manager.

The purpose of the review is to ensure consistency and sufficiency of the contents of our responses. It is important that actions taken and the reporting of same are consistent with the Sodexo Promise of Respect and Fair Treatment policy and EEO Law. Note: in the event of EEO claims or litigation, all written responses are “discoverable”.

Elements such as specific dates, times, location and accurate names and titles are essential, as well as, a clearly written summary of the allegations and the actions taken that address each (in the case of multiple issues) of the call’s issues.

The response should include a summary of final resolution, record of contact with caller and the caller’s response to the actions taken.

After reviewing the case log notes and request for approval - if there are concerns with any part of the response – the call will not be closed, instead the call is returned to the investigator for additional information. If the response is sufficient, then the Hotline Manager confirms that the appropriate outcome and disposition were selected and that a final closure message is included. Once this is reviewed and confirmed the call is recorded as closed.

Confidentiality and integrity of the program:

Human Resources role in the Business Abuse Hotline process is to ensure that effective investigations are conducted while maintaining confidentiality and utilizing the most appropriate method(s) to gain information or further insight into an issue.

Access to the web-based, Case Management System, “Netclaim”, the PDF file and the case log with call history are confidential documents and are released only to authorized area HR professionals. As with all employee issues that are brought to the attention of Human Resources, disclosure of same is on a “**need-to-know**” basis only. Therefore, the Network access and the PDF file with call history cannot be released or forwarded to a second party (GM, DM) for purposes of conducting an investigation.

Human Resources can definitely receive assistance from the District Manager or General Manager in the investigation process; however, it is requested that network call information is either shared via a phone conversation or an e-mail with need to know information only.

As part of the investigation process, interviews may include but are not limited to the person making the complaint, those named in the complaint, as well as, the respective GM, DM. Information may be gained through phone interviews, documents, on-site interview/investigation, etc. Investigating allegations of discrimination, harassment or retaliation should be conducted personally by Human Resources.

Record Retention:

It is recommended that each Sodexo Human Resource Professional responsible for managing Hotline calls, maintain a file with a copy of each call and its resolution for seven (7) years. The seven years is consistent with Company policy (CP-225) and the retention of “investigatory” files.