

## Lobbying Policy Statement

This policy defines the parameters for any lobbying activity carried out on behalf of Sodexo in order to comply with Sodexo's legal requirements and ethical commitments.

### 1. Policy statement

Lobbying is a normal, acceptable and useful part of the legislative process, provided it is conducted in compliance with all applicable legal requirements. Proper lobbying activities can inform lawmakers about Sodexo UK & Ireland's legitimate interests. It is Sodexo's policy to strictly comply with all applicable legislation relating to lobbying wherever Sodexo does business.

This policy is subject to all applicable laws and Sodexo's policies and procedures.

### 2. What it means

- In the UK and Ireland, Sodexo employees are often asked to provide opinion and advice to government bodies. Sodexo recognises and encourages these lobbying activities as part of being a good corporate citizen, and the company sees this as an opportunity to enhance its reputation and influence the development of public policy.
- Additionally, Sodexo employees interact operationally with central or local government officials on a daily basis. From time to time, this interaction may constitute lobbying. If in doubt, Sodexo personnel should always check with the government relations team to clarify if this is the case.
- All lobbying activities on behalf of Sodexo must be carried out in coordination with Sodexo's government relations team. The team reserves the right to conduct lobbying activities centrally when the sensitivity to the business is considered too high.
- Any lobbying activity carried out by Sodexo employees must comply with all applicable laws and Sodexo's policies and procedures including without limitation the Sodexo Code of Ethics, in particular with regards to business practices which are founded on the standards of honesty and integrity (paragraph 2.1), political activity (paragraph 2.3) and Sodexo's Rules of Conduct (paragraph 2.6).

### 3. What to avoid

- Discussions on Sodexo's behalf about legislation, rule-making or policy development with elected officials or administrative employees, unless you have prior approval from Sodexo's government relations team and your assigned Sodexo legal counsel.
- Disclosure of commercially confidential data, including confidential price-sensitive information, as described in Sodexo's Code of Ethics (paragraph 2.5).

- Contravening Sodexo's Rules of Conduct in discussions with third parties, in particular with regards to defamation and bringing the company into disrepute (paragraph 2.6). This does not undermine your right to express your personal opinion when not acting on behalf of Sodexo.

#### 4. Document Control

Revision number	Date	Revision description	Authorised by	Endorsed by
Version 1	16 November 2011	New policy	Phil Hooper	Aidan Connolly