



ETHICAL PRINCIPLES



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OUR FUNDAMENTAL ETHICAL PRINCIPLES

The Elior Group Ethical Principles are aimed at creating a shared framework for the conduct of all Group employees in their daily working lives. These principles are based on clear and strong values with an overriding objective of achieving excellence, and they allow us to unite and work together towards the same goals. Each and every one of us is an ambassador for our Group and has a key role to play in safeguarding the trust that our clients place in us, which in turn is vital for the success of Elior Group as a whole.



Each of our ethical principles should be used as the basis for a continuous improvement approach in our everyday conduct, for Elior Group to be the caterer of choice.

The following principles are a clear illustration of our proactive strategy to support and promote the main international ethics standards and guidelines, i.e. the Universal Declaration of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Sustainable Development Goals.

In line with our sustainability commitments, we are resolutely focused on ensuring that in our everyday conduct we act as a partner in excellence for our customers and suppliers, a committed employer for our people, and a responsible player for the society and environment in which we live and work.

Philippe Guillemot
Chief Executive Officer of Elior Group



UNITED NATIONS GLOBAL COMPACT

Officially launched in 2000 by Kofi Annan (then Secretary-General of the United Nations), the Global Compact is a call to companies to uphold ten universal principles relating to human rights, international labor standards, environmental protection and anti-corruption, with a view to achieving responsible and sustainable development.

At Elior Group we place particular importance on corporate social responsibility and we have been a member of the Global Compact since 2004. As a result, we have committed to aligning our strategies and operations with the Global Compact's ten principles, and its fundamental values form the backdrop to our ethical principles.

HUMAN RIGHTS

1

Businesses should support and respect the protection of internationally proclaimed human rights; and

2

make sure that they are not complicit in human rights abuses.

3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining,

4

the elimination of all forms of forced and compulsory labour;

5

the effective abolition of child labour; and

6

the elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

7

Businesses should support a precautionary approach to environmental challenges,

8

undertake initiatives to promote greater environmental responsibility; and

9

encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

10

Businesses should work against corruption in all its forms, including extortion and bribery.

ETHICAL CONDUCT WITHIN ELIOR GROUP





DAILY ETHICAL CONDUCT

Conflicts of interest

Avoid holding any equity interests – either directly or through a third party – in companies that have business relations with the Group when such holdings could lead to a conflict of interest. Similarly, ensure that any activities you may be involved in outside the Group do not represent a conflict of interest with the duties you perform either within the Group or on behalf of the Group in external organizations such as trade associations.

Confidentiality

In all circumstances – i.e. in professional, family and amicable relations – treat as strictly confidential all non-public information about the Group, notably concerning its strategy, executives, business activities, results and financial performance, organizational structure, expertise, contracts and other tangible assets.

Similarly, ensure the confidentiality of any information received from the Group's business partners, in accordance with the principles set out in the Group's Communications Charter.

Respecting the Group's assets

Act in all circumstances in a way that does not adversely affect or damage any of the Group's assets – both tangible assets (equipment, machinery, facilities) and intangible assets (contracts, brands, IT data, confidential information, expertise, reputation and image).

Representing the Group

Constantly seek to safeguard the Group's reputation and act in its best interests. Only speak or write in the Group's name in connection with the performance of your professional duties and in accordance with (i) any authorizations and/or delegations that have been given to you and (ii) the Group's Communications Charter.

Use of assets belonging or entrusted to the Group

Use the tangible and intangible assets that belong to the Group (or which have been entrusted to Group companies by customers or suppliers) only for the Group's purposes and in accordance with the terms and conditions applicable on a local basis.

Avoid any inappropriate use of these assets, particularly personal use or wastage.

Political opinions and religious beliefs

Do not engage in any political or religious activities or practices at work or during working hours, unless specifically authorized under the applicable laws.

Non-harassment

Respect personal dignity and do not psychologically or sexually harass any other person.

Equal opportunities

Do not commit any form of discrimination, particularly on the grounds of gender, sexual orientation, family situation, age, disability, origin (ethnic, social, cultural or national), political opinion, trade union affiliation, philosophical inclination or religious beliefs, real or alleged.





ETHICAL CONDUCT OF MANAGEMENT

Training and mobility

Ensure that the Group's employee training and internal mobility policy is applied.

Application of the Group's ethical principles

Act – and ensure that all company members act – in an ethical manner in accordance with the Group's ethical principles.

Employee health and safety

Ensure the health and safety of all employees.
Respect employees' private lives, notably in terms of working hours and confidentiality of personal information.

Non-discrimination

Ensure that the principle of non-discrimination is respected, not only during the recruitment process but also in any decisions relating to training, promotion and mobility, compensation and working conditions in general.

ETHICAL CONDUCT IN RELATION TO ELIOR GROUP'S STAKEHOLDERS





ETHICAL CONDUCT IN RELATIONS WITH SHAREHOLDERS AND PUBLIC AUTHORITIES

Integrity of HR, accounting and financial information

Only disclose HR, accounting or financial information or include such information in documents if you are sure that it is accurate and if you have been authorized to share such information and/or make it public.

Ensure that information and documents are kept in accordance with the regulations applicable in each country concerned, and closely cooperate with internal and external auditors.

Disclosing accounting and financial information

Disclose accounting and financial information in accordance with the applicable authorizations and the Group's Communications Charter and internal rules – notably in terms of financial communications, which are subject to specific regulations.

Inside information

Do not use for personal purposes – including by disclosure to third parties – any unpublished information that could have an impact on Elior Group's share price.

Respecting the laws of each country

In each country where the Group is present, respect the applicable laws, regulations and professional standards of that country.



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ETHICAL CONDUCT IN RELATIONS WITH CUSTOMERS, SUPPLIERS AND MEMBERS OF CIVIL SOCIETY

Application of ethical principles by the Group's partners

Ensure that the Group's partners (suppliers, service providers, subcontractors, members of civil society, etc.) apply ethical principles that are in line with those of the Group.

Ensure that any ethical principles the Group specifically commits to in connection with contracts entered into with its partners are fully respected.

Fair competition and anti-corruption

Ensure that the rules of fair competition are respected in all circumstances, i.e.:

- when the Group is a supplier and replies to invitations to tender, and during other competitive bid processes launched by customers; and
- when the Group is a purchaser and selects suppliers of products or services.

Refrain from any conduct or practices that breach the applicable anti-trust regulations.

Ensure that you do not actively or passively engage in any form of corruption, either in the public or private sector.

Quality and safety of products and services

Ensure the quality and safety of the products and services supplied to customers, in accordance with the applicable legislation and standards. Ensure compliance with laws relating to information about products and services, notably consumer information.

Ensure that any customer or consumer complaints or requests for information are dealt with appropriately.

React promptly to any quality or safety problems and apply the Group's corresponding procedures.

Gifts and invitations

Only give or receive gifts or invitations from Group partners when strictly necessary for consolidating the Group's brand image and maintaining healthy commercial relations. In general, ensure that the value of any gifts and invitations is symbolic and is not such as could influence a business decision.

Strictly apply the procedures defined within the Group in relation to gifts and invitations and respect any legal prohibitions applicable in the Group's countries of operation.

Refuse and do not give any cash gifts.



WHO DO THESE ETHICAL PRINCIPLES APPLY TO?

The Elior Group Ethical Principles apply to all of the companies that the Group controls, in all of the countries where it carries out business, and to all of its employees. These principles set out the Group's main commitments to various stakeholders, notably customers, suppliers, partners, and employees.

The ethical principles do not replace the rules and standards applicable within the Group. Instead, they form a guiding framework for all of its existing and future strategies and policies.

Each Group employee, whatever their position, grade, entity or country of work, must act in accordance with the ethical principles, and it is the responsibility of the Group's executives to ensure that each employee is familiar with their content and aims. These principles must be applied taking into account the laws, policies and practices in force locally in each country and do not replace any laws or regulations of any country in which the Group operates.

If you have any questions,
do not hesitate to request for additional information
or to ask a question to your manager who may seek advice from
the Group's Legal Department or Human Resources Director,
depending on the nature of the question.

This document has been translated into the languages of all of the countries in which the Group operates. All possible care has been taken to ensure that the translations are an accurate representation of the original. However, in all matters of interpretation of information, views or opinions expressed therein, the original language version of the document in French takes precedence over any translation.

This document is available on the Group's intranet and website.



Elior Participations, a French partnership limited by shares (Société en commandite par actions) with a share capital of €5,309,530.00, whose registered office is located at Paris La Défense Cedex (92032), 9-11 allée de l'Arche, France and which is registered with the Nanterre Trade and Companies Registry under number 380 543 678 RCS NANTERRE.
Design: Les Périscopes - Credits : Elior Group - February 2022