

Anti-Bribery and Corruption Policy

Purpose

The Anti-Bribery and Corruption Policy defines the way in which Elior UK operates and ensures compliance with the Group Elior Integrity Policy (which all colleagues must adhere to and which can be found at <https://integrity.eliorgroup.net>) and the Bribery Act 2010 in the UK. Elior UK values its reputation for ethical behaviour and our corporate conduct is based on our commitment to acting professionally, fairly and with integrity. Elior UK does not tolerate any form of bribery or corruption.

Scope

This Anti-Bribery and Corruption Policy is an information tool for our clients, suppliers, operators, sales, marketing and purchasing departments which summarises our company practices and approach to Anti-Bribery and Corruption. Failure to adhere to the provisions of the Bribery Act 2010 could result in unlimited fines and/or imprisonment.

Background

Bribery is the giving or accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. Often the value is the gaining of a commercial, contractual, regulatory or personal advantage. The purpose of this policy is to set out the rules that must be followed at Elior UK to ensure that no bribery occurs.

Responsibilities

Our principal commitment is to ensure full compliance with the law on anti-bribery and corruption. As such, Elior UK **prohibits**:

- the payment, or offer to pay or acceptance of bribes or;
- the provision of or offer to provide or acceptance of gifts or anything of value for improper purposes;

to/from customers, suppliers, politicians, government advisers, private persons or companies to obtain or retain business or any other benefit and upholds that the provision of or acceptance of such payments or gifts will result in disciplinary action (and may result in immediate dismissal) for those involved in payment or receipt depending on the seriousness and frequency of the events.

Elior UK is committed to acting professionally, fairly and with integrity and ensures that adequate procedures are in place to monitor and report, where appropriate, any offer of a gift or an invite to a hospitality event.

Elior UK runs hospitality events as part of its service offering to its clients and also, in its own right, Elior UK occasionally runs hospitality events, primarily aimed at thanking clients and suppliers for their custom and loyalty. A colleague must not organise any such hospitality event without seeking authority from his or her line manager in accordance with the Elior UK Bribery Act compliance process. Any gift or invitation, given or received must:

- not benefit family members save in exceptional circumstances;
- not be given or received more than twice per annum;
- not be offered during a tender process;
- not be sent to or received at home, but at the workplace;
- if hospitality, where possible, delivered at a site operated by Elior;
- be done only after ensuring that the invitation (where Elior are hosting) was subject to the recipient's own company policies in relation to hospitality.

A Hospitality Form, available on the Elior UK extranet, must be completed by the Elior UK colleague for each hospitality event given or received in excess of £75. Gifts given or received in excess of £75 are not permitted.

Hospitality in excess of £500 must be approved by Elior UK's CEO where hospitality given or received is at a Stadia client site or is one of the other permitted activities listed in the Hospitality Form but the value must never exceed £1,000. Any other hospitality in excess of £500 is only permitted with the prior authorisation of Group Elior CEO's Chief Compliance Officer via Elior UK's Legal and Compliance Director and Group Elior's Chief Compliance Officer.

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Copies of all forms need to be sent to Elior UK's Legal and Compliance Director.

The prevention, detection and reporting of bribery and corruption is the responsibility of all colleagues throughout Elior UK. Colleagues can confidentially report any suspicion of bribery through the Elior Group Whistleblowing procedure by addressing an email to alert.eliorgroup@iscope.solutions or via Elior UK by calling 01625 448777, option 4 then option 1, or by contacting the Elior UK Head of Legal. Before contacting the hotline, please read through the Whistleblowers charter which explains how the line works (including confidentiality) which can be found in the tab "reporting an ethics issue" at <https://integrity.eliorgroup.net/>

Governance

This policy will be reviewed at least annually at Board level and will be revised in accordance with any changes to the Bribery Act 2010 and any associated guidance. The Legal department, in conjunction with the Elior UK Academy and the HR department will ensure that colleagues are fully trained in matters relating to Anti-Bribery and Corruption and that Anti-Bribery and Corruption awareness form part of the induction process for new colleagues.



Catherine Roe
Chief Executive, Elior UK
2 December 2019