

Sponsorship and Donations Policy

Purpose

This Sponsorship and Donations Policy supports Elior UK's compliance with the Elior UK's Anti-Bribery and Corruption Policy and 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 Sponsorship and Donations Policy is an information tool for our clients, suppliers, operators, sales, marketing and purchasing departments which summarises our company practices and approach to Sponsorship and Donations. Failure to adhere to the provisions of this Policy and therefore 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 and can include sponsorships and donations. The purpose of this policy is to set out the rules that must be followed at Elior UK to ensure that no inappropriate sponsorships or donations occur.

Responsibilities

Group Elior supports sporting, cultural and charitable causes. Sponsorship is permitted by Elior UK provided that it is not concerned with any commercial return on agreement, outlines the financial commitment by Elior UK and subject to the prior approval of Elior UK's Leadership Team (via Elior UK's Head of Legal). Any such arrangement needs to be no greater than one year in duration and needs to comply fully with Elior UK's Anti Bribery and Corruption Policy.

In relation to donations, is it generally acceptable to support charitable causes endorsed corporately, individually and by clients. However not all charitable causes are appropriate for Elior UK to support and donations to political parties or public authorities are strictly forbidden. All donations, whether cash or goods to be made by Elior UK must be approved in advance by the Leadership Team, via Elior UK's Head of Legal, to ensure that the donation is to an appropriate organisation and of an appropriate monetary value. In the unusual event that such donations are in excess of £10,000, the prior approval of (1) the Elior UK Leadership Team, (2) Group Elior's Chief Compliance Officer (via Elior UK Head of Legal), (3) Group Elior's Communications Department and (4) Group Elior's General Counsel must be obtained. All donations must comply with the Elior UK Anti Bribery and Competition Policy.

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 Whistleblower's 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 legislation 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 (including conflict of interest) and that Anti-Bribery and Corruption awareness form part of the induction process for new colleagues.



Catherine Roe
Chief Executive, Elior UK
20 June 2019