

GIFT AND HOSPITALITY POLICY

1. Purpose

This Gift and Hospitality Policy sets forth Elior North America's requirements for conducting business with clients, vendors, and other third-parties. Elior North America will not tolerate any acts of corruption. For that reason, Elior North America's team members are required to engage in ethical conduct in all current and prospective business relationships.

2. Objectives

This Gift and Hospitality Policy is a tool to help team members identify and avoid engaging in any actions that could be construed as corruption. Our main commitment is to ensure compliance with applicable anti-corruption laws, which may include, without limitation, the Foreign Corrupt Practices Act ("FCPA") and Sapin II. Elior North America team members who fail to comply with Elior North America's Gift and Hospitality Policy may be subject to disciplinary action, up to and including termination.

3. Responsibilities

Elior North America understands that, when done properly, giving and receiving modest gifts and reasonable hospitality invitations may lawfully facilitate the development and maintenance of business relationships. Any offer, approval, giving or receipt of gifts or hospitality invitations must comply with Elior North America's Gift and Hospitality Policy. In certain instances, the terms and conditions of a gift or hospitality invitation will depend upon different factors, such as whether the intended recipient is a governmental or private employee or whether it is a gift or hospitality invitation. For purposes of this policy, a gift is an item of value that is either: (i) an object or (ii) a hospitality event (e.g. travel, lodging, meals, entertainment, etc.) where the providing party is not in attendance. Conversely, hospitality involves a hospitality event where the providing party is in attendance. In addition, nothing in this policy should be construed as prohibiting providing meals at our locations as may be customary, permitted and/or required under the standard sales process. Elior North America specifically prohibits any gift offer or hospitality invitation that could affect (or give the appearance of affecting) the recipient's business judgment. Therefore, Elior North America advises the following with regard to gifts and hospitality:

In All Cases. It is impermissible for any Elior North America team member or affiliate to offer, approve, give or receive a gift or hospitality invitation that:

- is illegal under applicable statute, law, rule or regulation;
- violates the policies of Elior North America or Elior Group;
- violates the gift and/or hospitality policies of the recipient's organization;
- occurs during a competitive bid or tender process;
- involves a government employee, agent or official (referred to in the is policy as a "Government Official") with direct regulatory authority over Elior North America, its subsidiaries, or its operations (e.g. tax auditor, health inspector, etc.);
- is unreported to management, compliance or other company authority in accordance with this Policy and the Elior North America Integrity Guide—regardless of whether a team member uses personal or company funds to pay for the gift or hospitality;

- is received at home (in the case of a gift)—all gifts should be delivered to the recipient’s workplace;
- benefits the family of the intended recipient—all gifts and hospitality invitations must remain in a professional setting except in exceptional circumstances;
- is likely to negatively impact the public’s perception and reputation of Elior North America; or
- is cash, a cash equivalents (e.g. gift cards, stocks, bonds, etc.) or payment of personal bills or personal expenses.

Additional Requirements for Private Sector Clients, Prospective Clients or Business Partners: Team members must seek the following approvals for offering or receiving any gift or hospitality invitation that exceeds the limits set forth in the Elior North America Private Sector Clients, Prospective Clients, Vendors or Business Partners Limit Policy (2020).

ELIOR NORTH AMERICA PRIVATE SECTOR CLIENTS, PROSPECTIVE CLIENTS, VENDORS OR BUSINESS PARTNERS LIMIT POLICY- 2020			
Level	Gift Monetary Limits Up to 2 Times/Year Per Person	Hospitality Monetary Limits Up to 3 Times/Year Per Person	Approval Required
Level 1	\$0-100	\$0-\$100	No approval required
Level 2	\$100-\$250	\$100-250	Immediate Elior North America Supervisor (if none then Elior North America Compliance or Elior North America CFO)
Level 3 (Prior Approval Required)	\$251-\$500	\$251-\$500	<ul style="list-style-type: none"> • Operations/Support/Sales Leader; AND • Elior North America CEO, Elior North America CFO or Executive VP of HR; AND • Elior North America Compliance
Level 4 (Prior Approval Required)	Over \$500 (not possible for receiving)	Over \$500	<ul style="list-style-type: none"> • Operations/Support Sales Leader; AND • Elior North America CEO, Elior North America CFO or Executive VP of HR; AND • Elior North America Compliance • Elior Group CEO; AND • Elior Group Chief Compliance Officer

Giving Gifts or Hospitality Invitations:

- gift or hospitality expenses should be reported via regular expense reporting procedures and follow the required approval process set forth above;
- gifts must not be given more than twice per year, to or by the same individual;
- hospitality invitations must not be given more than three times per year, to or by the same individual;
- Elior NA CEO, Segment President, CFO and CGO shall be able to offer a single hospitality invitation with an aggregate value of up to three times the monetary limits in lieu of three separate invitations (a list of three such qualifying events shall be provided to Elior Group CCO biannually);
- nominal hospitality invitations (e.g. a cup of coffee) shall not count toward the number of invitations;
- only individuals with corporate credit cards are authorized to offer gifts and hospitality invitations;
- For all Level 2 or Higher Gifts or Hospitality Invitations:
 - o the Gift and Hospitality Form must be completed, approved and a copy must also be scanned and submitted with team members’ expense reports; and

- o supervisors should only approve those expense reports for gifts or hospitality expense accompanied by the properly executed Gift and Hospitality Form. All expense reports without a proper Gift and Hospitality Form should be reported by the immediate supervisor to the Elior North America Compliance team. Employees submitting expense reports without proper Gift and Hospitality Forms may be held personally responsible for unauthorized expenses and/or may face discipline up to and including termination.

Receiving Gifts or Hospitality Invitations:

- gifts must not be received more than twice per year, to or by the same individual;
- hospitality invitations must not be received more than three times per year, to or by the same individual;
- Elior NA CEO and CGO shall be able to receive a single hospitality invitation with an aggregate value of up to three (3) times the monetary limits in lieu of three separate invitations;
- nominal hospitality invitations (e.g. a cup of coffee) shall not count toward the number of invitations;
- For all Level 2 Gifts or Hospitality Invitations:
 - o the Gift and Hospitality Form must be completed, approved and a copy must also be scanned and submitted to the Elior North America Compliance team; and
 - o supervisors should only approve receipt of gifts or hospitality invitations accompanied by the properly executed Gift and Hospitality Form. All acceptance of gifts or hospitality without completion of the Gift and Hospitality Form should be reported to the Elior North America Compliance team for further investigation.

With respect to Foreign Officials, Government Officials and Union Officials: Team members must use caution when providing a gift or offering hospitality to: (i) any government employee, agent or official, whether elected, appointed, current, former or awaiting office (referred to in this policy as "Government Official") and their families; (ii) any union employee, agent or official ("Union Official") and their families; any officer or employee of a foreign government or any department, agency or instrumentality or of a public international organization, or any person acting in an official capacity for or on behalf of any such government or department, agency or instrumentality ("Foreign Official"); and (iv) any political party official or employee thereof. Team members must seek the following approvals before offering or accepting any gift or hospitality exceeding the below limits for each recipient within the fiscal year:

Recipient	Gift Monetary Limits	Hospitality Monetary Limits	Approval Required
Foreign Official	Nominal Holiday Remembrance (e.g. cards, candy, etc.), not to exceed \$20 per holiday gift	Routine lunches and dinner not to exceed \$20 per meal	Immediate Elior North America Supervisor (if none—Elior North America Compliance), any requested exceptions to this must be with advance written approval of the Elior North America Compliance Department.
Federal Gov't Official			
Union Official			
State or Local Gov't Official	Modest and Reasonable (never greater than the Limits for Private Client Gifts and dependent upon governing policies/law)	Modest and Reasonable (never greater than the Limits for Private Client Gifts and dependent upon governing policies/law)	If \$20 or less, the Immediate Elior North America Supervisor (if none—Elior North America Compliance);

			for all other Gifts or Hospitality, Elior North America Compliance Department
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- For all hospitality events involving a Government Official, an Elior North America team member must be present.
- All gift or hospitality expenses should be reported via regular expense reporting procedures and follow the required approval process;
- the Gift and Hospitality Form must be completed, approved and a copy must also be scanned and submitted with team members' expense reports; and
- Supervisors should only approve those expense reports for gifts or hospitality expense accompanied by the properly executed Gift and Hospitality Form. All expense reports without a proper Gift and Hospitality Form should be reported by the immediate supervisor to the Elior North America Compliance team.

4. Prevention and Detection of Corruption

The protection, detection and denunciation of bribes and other acts of corruption are the responsibility of all Elior North America team members. Any reports of suspected corruption can be reported in any of the following ways:

- Emailing Elior North America's Compliance Team – compliance@elior-na.com
- Using Elior Group's dedicated whistleblower line [\[redacted\]](#)
- Emailing Elior Group's Chief Compliance Officer – chiefcomplianceofficer@eliorgroup.com



Olivier Poirot
CEO
2020