

## Conflict of Interest Policy

### Purpose

This Conflict of Interest Policy supports Elior UK's compliance with the Elior UK's Anti-Bribery and Corruption Policy and 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 Conflict of Interest Policy is an information tool for our clients, suppliers, operators, sales, marketing and purchasing departments which summarises our company practices and approach to Conflict of Interests.

### Background

A conflict of interest is a set of circumstances that creates a risk that an individual's ability to apply judgement or act in one's role is, or could be, improved or influenced by a secondary interest or a family member, friend or contact. Often the value is the gaining of a commercial, contractual, regulatory or personal advantage for yourself or family member, friend or contact. The purpose of this policy is to set out the rules that must be followed at Elior UK to ensure that no inappropriate activity where there is a conflict of interest occurs.

### Responsibilities

The duties which directors and any other colleague exercising any form of control over the business in their day to day conduct include acting in the best interests of the company, exercising his/her powers for the proper purpose and avoiding any conflicts of interests. This includes such individuals not placing themselves in a position where their personal interest conflicts with their responsibilities for the company.

In the event of a conflict of interest (or potential conflict of interest) the Elior UK colleague should flag this their immediate line manager. If the line manager decides, (acting in the best interest of the company), that the conflict of interest could be overcome by arms lengths dealing, then the line manager should report potential conflict to Elior UK's Head of Legal to obtain the requisite approvals. Even where approval is granted, under no circumstances should the Elior UK colleague who holds a direct or indirect interest, participate in the contract negotiations and an independent colleague should conduct those negotiations and ensure that the contract is in the best interest of the company and that any consideration payable or receivable is in line with market.

The prevention, detection and reporting of conflicts of interest/a suspected conflict of interest by other colleagues is the responsibility of all colleagues throughout Elior UK. Colleagues can confidentially report any suspicion through the Elior Group Whistleblowing procedure through completing the form available at <https://integrity.eliorgroup.net> or via Elior UK by calling 01625 448777, option 4 then option 1, or by contacting the Elior UK Head of Legal.

### 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