

POLICY TOWARDS INTERMEDIARIES

I. Purpose

This policy defines the framework within which Elior India manages its relation with intermediaries or business providers in accordance with the Elior India's Anti-Corruption & Bribery Policy, Integrity & Ethics guidelines available at <https://integrity.eliorgroup.net/> and the laws applicable in India. Each employ working in Elior India or its affiliates must adhere to its Policies and shall strictly comply with its norms. Elior India does not tolerate any act of corruption.

II. Scope of Applicability

This Policy towards Intermediaries is an information tool for our potential partners and for employees in the fight against corruption in the context of our business or activities. This Policy applies to its Management, Employees, Contractual workers, Clients/Customers, Professional Consultants, Agents, Suppliers, Operators, Sales & Marketing and Vendors to comply with Elior's standard rules and regulations to be compliant in every aspect.

III. Responsibilities

Elior India commits to ensure full compliance with anti-corruption laws of India and other applicable laws. It is strongly recommended, whenever possible, to avoid entering into this type of relationship and to identify, with the CEO himself, the very rare circumstances in which such contracts would be necessary or to comply with existing norms to be in line with the integrity and ethical principles of the Company.

The person involved in the negotiation must enter into a contract and have complied with the validation process in terms of commercials negotiation post seeking necessary approvals from the legal for entering into a contract. Within these restricted circumstances, the standard contract defined by the Group's legal department specifically for this type of service must always be used. This contract must be signed by the parties without any modification unless it has been previously approved by the Group's legal department.

In fact, before any signature, the Group's General Counsel and the Group's Chief Compliance Officer must have received for validation the drafts of these contracts together with the motivations behind such a relationship. When the contract is signed and the service has started, it is essential to gather all the documentation and justifications that can corroborate the real existence of the service described in the contract. It is essential that we all be vigilant because of the considerable impact of the risks that can be incurred from a financial, reputational, legal and criminal point of view. All contracts of this nature must be brought together in a single file within the Legal Department.

The Company requires to maintain list of Intermediaries as per the **Annexure I**

IV. Non-Adherence

The Policy specifies the good practices defined in the Group's Elior integrity & Ethics guide, which all persons concerned must respect or otherwise be subject to disciplinary sanctions, which may go as far as immediate dismissal, depending on the seriousness and frequency of the events.

V. Prevention and detection of corruption

The prevention, detection and reporting of corrupt practices is the primary responsibility of all the employees working with Elior India or its affiliates as per the norms defined in the Integrity & Ethics guidelines. Any employee who witnesses a breach of this policy is obliged to promptly report the matter to the dedicated line for whistleblower as per **Group Elior Whistle blower charter** by contacting the compliance consultant through email at alert.eliorgroup@isope.solutions or by calling on **India help line No 0008003201479** or reporting the matter to **Company Secretary & Legal**.



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