

SPONSORSHIP AND DONATION POLICY

1. Purpose

Elior North America prohibits corruption. This Sponsorship and Donation Policy defines how Elior North America makes only lawful and ethical sponsorships and donations to clients and other third-parties. Elior North America's team members must follow the Sponsorship and Donation Policy when making any sponsorship or donation.

2. Objectives

This Sponsorship and Donation Policy is a tool to help team members involved in offering sponsorships and/or donations on behalf of Elior North America or any of its subsidiaries. We comply 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 this Sponsorship and Donation Policy may be subject to disciplinary action, up to and including termination.

3. Responsibilities

Elior North America supports charitable causes through sponsorship and donations. Sponsorship and donations are permitted provided that: (i) a commercial return is not requested, required or implied; (ii) the financial commitment is set forth in written agreement; and (iii) has been pre-approved by appropriate leaders and the Elior North America Compliance team. In order to allow the Elior North America Compliance team adequate time to approve your request, please provide your request at least fourteen (14) days in advance. In addition, for every sponsorship or donation made, please provide written documentation from the charitable organization with proof of the donation made to the Compliance team (team members will not receive this documentation until after the donation is made).

It is generally acceptable to support charitable causes that we endorse as a company and those endorsed by our clients. However, not all charitable causes are appropriate for Elior North America to support. Team members are prohibited from making donations to political parties, public authorities or anyone running for public office (including law enforcement) on behalf of Elior North America or any of its subsidiaries

Every Elior North America team member should be aware of the risks that can arise out of the sponsorship and donation process—including financial, legal and reputational risk. Governmental Agencies can conduct audits or inspections that will require a detailed review of Elior North America's sponsorships and donations to ensure that any such contributions meet all applicable legal and ethical standards. In order to properly prepare for any such investigation or audit all sponsorship and donations must be reported to the Elior North America compliance department and will be included in a single database that can be easily reviewed. Sponsorships or Donations that are part of the bidding/contract process will be reviewed as a function of the Legal/Compliance contract review. All other donations, whether cash or in-kind donations, must be approved in advance by the Elior North America Compliance team to ensure that the donation is to an appropriate organization and of an appropriate monetary value. The only exception to the rule requiring pre-approval is for in-kind donations due specifically to overproduction (i.e. not hitting your budget as a planned donation) that cannot be reasonably anticipated in advance. Such donations should be reported after the fact using the same reporting procedure so that they can be properly tracked and accounted for. In the rare circumstance that a donation exceeds \$10,000 additional approval is required from Elior Group's Chief Compliance Officer. All donations must comply with Elior North America's Integrity Guide as well as the Elior Group Integrity Policy.

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
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