



## Competition Law Policy

### Purpose

This Competition Law Policy defines the way in which Elior UK operates and ensures compliance with the Group Elior Integrity Policy (which all colleagues must adhere to and which can be found at <https://integrity.eliorgroup.net>) and competition law in the UK.

### Scope

This Competition Law Policy is an information tool for our clients, suppliers, operators, sales, marketing and purchasing departments which summarises Elior UK practices and approach to Competition Law. All of Elior UK's colleagues are required to work within the "best practice" guidance provided by the Legal Department.

Failure to adhere to competition law could result in civil sanctions including a fine of up to 10% of worldwide turnover and disqualification of directors for up to 15 years. Individuals prosecuted for a cartel may be liable for imprisonment for up to five years.

### Background

The aim of competition law is to protect and promote fair competition in the UK. It prohibits companies from reaching agreements or understandings with each other to do things such as fixing prices, allocating customers, sharing markets or unlawfully excluding competitors.

We are fully committed to competition law compliance and adopt a rigorous approach to competition law issues.

### Responsibilities

Our principal commitment is to ensure that in providing catering and facilities management services and in sourcing products and services to our business. Elior UK does **not** engage in conduct which is anti-competitive and therefore unlawful: price fixing, sharing pricing information, sharing commercially sensitive information or allocating customers, market or products.

Elior UK is strict about setting its own selling prices. Elior UK must be free to decide the price at which it sells its services to its clients. Suppliers cannot fix our retail selling prices. Fixing our selling prices with a supplier is a very serious breach of competition law.

In terms of the support we offer to our sales teams, in relation to tenders, we ensure that Elior UK bids for contracts independently from and without any agreement or arrangement with any of its competitors. Furthermore, we ensure that Elior UK does not enter into agreements with competitors concerning the pricing of bids or bidding strategies.

The Legal Department is committed to ensuring that Elior UK **never** works with competitors to reduce competition in the market place. Elior UK must always encourage fair competition.

The prevention, detection and reporting of anti-competitive behaviours is the responsibility of all colleagues throughout Elior UK. Colleagues can confidentially report any suspicion of anti-competitive practices through the Elior UK HR Helpdesk on 01625 448777, option 4 followed by option 1, or by contacting the Elior UK Legal and Compliance Director.

### Governance

Managed by our Legal and Compliance Director, our Legal Department is made up of experienced professional qualified solicitors and paralegals who work with the Leadership Team, operational directors and managers, the sales and marketing teams and the shared service centre teams to ensure that we are fully compliant with Competition Law. The in-house lawyers support this process by actively providing training, advice and "best practice" guidance. This policy is reviewed at least annually at Board level and will be revised in accordance with Elior UK's procedures and any changes in legislation.

**Catherine Roe**  
Chief Executive, Elior UK  
16 December 2020