

Relations with Intermediaries Policy

Purpose

This Relations with Intermediaries Policy supports Elior UK's compliance with the Elior UK Anti-Bribery and Corruption Policy, the Group Elior Integrity Guide (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 Relations with Intermediaries Policy is an information tool for our clients, suppliers, operators, sales, marketing and purchasing departments which summarises our company practices and approach to intermediaries such as agents, consultants, those who receive a finder's fee or those who introduce business to Elior UK. Failure to adhere to the provisions of this policy and therefore the Bribery Act 2010 could result in unlimited fines and/or imprisonment.

Background

Bribery is the giving or accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. Often the value is the gaining of a commercial, contractual, regulatory or personal advantage. The purpose of this policy is to set out the rules that must be followed at Elior UK to ensure that no bribery occurs in relation to Elior UK's dealing with intermediaries.

Responsibilities

Elior UK can enter into agreement with third party agencies, introducers and/or those who receive a finder's fee for introducing business to Elior UK, provided that the return to the third party company is a commercial return in line with market expectations, at arm's length, is not excessive, that there is no unauthorised conflict or interest involved, is documented in an agreement reviewed and negotiated by the Legal Department and is subject to signature by the appropriate director in accordance with the Elior UK Delegation of Authorities Policy.

The prevention, detection and reporting of bribery and corruption is the responsibility of all colleagues throughout Elior UK. Colleagues can discuss concerns direct with the Human Resources department by contacting 01625 4487777, option 4 then option 1, or Elior UK's Legal and Compliance Director. Additionally, they can confidentially report any suspicion of bribery and corruption through the Elior Group Whistleblowers' Charter by addressing an email to alert.eliorgroup@iscope.solutions or dialling 00 800 180 620 19 Monday to Friday between 9am and 6pm (CET) selecting the language of your choice and an operator will answer in the chosen language. Before contacting the hotline, please read through the UK Whistleblowers Charter which explains how the line works (including confidentiality) which can be found in the tab "reporting an ethics issue" at <https://integrity.eliorgroup.net/>

Governance

This policy will be reviewed at least annually at Board level and will be revised in accordance with any changes to the Bribery Act 2010 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 and that Anti-Bribery and Corruption awareness form part of the induction process for new colleagues.



Catherine Roe
Chief Executive, Elior UK
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