

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, with 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 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 Legal and Compliance Director 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 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 conflicts of interest / a suspected conflict of interest 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 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
14 December 2021