

CONFLICT OF INTEREST POLICY

1. Purpose

Elior North America will not tolerate any acts of corruption including, without limitation, engaging in unlawful conflicts of interest. This Policy defines how Elior North America manages potential conflicts of interest in accordance with applicable laws, Elior North America's Integrity Guide as well as the Elior Group Integrity Policy.

2. Objectives

This Policy is designed to help team members detect and avoid a potential conflict of interest. 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 Policy for Conflicts of Interest may be subject to disciplinary action, up to and including termination.

3. Responsibilities

Elior North America team members must ensure that their personal interests do not conflict with their professional responsibilities. A conflict of interest can occur where a team member or business has competing interest or loyalty that may conflict with their obligations to Elior North America or its subsidiaries.

In the event of a conflict of interest, or a potential conflict of interest, Elior North America team members must inform their immediate supervisor. If the immediate supervisor considers Elior North America's best interests and determines that the conflict of interest cannot be overcome, then the supervisor should inform the team member and the conflicting objective must be discontinued. If the immediate supervisor determines that the conflicting objective could be overcome by arm's length dealing, then the immediate supervisor should report any potential conflicts to Elior North America's Compliance team (via the form available) to obtain required approvals. If there is ambiguity, Elior Group's Chief Compliance Officer may be consulted. If approval is granted it should be noted that under no circumstances should the team member, who has a conflict of interest, conduct or participate in the sales or negotiation process. The Elior North America legal department should be informed to draft any necessary agreements (which should not be modified without express, written approval of the Legal Department). Fully executed copies of these contracts should be provided to the Elior North America Compliance team. Any agreement entered into should be in the best interests of Elior North America and any money paid or received should be in line with normal market rates.

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
- Emailing Elior Group's Chief Compliance Officer – chiefcomplianceofficer@eliorgroup.com



Olivier Poirot
CEO
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