

POLICY FOR ENGAGING WITH INTERMEDIARIES

1. Purpose

Elior North America will not tolerate any acts of corruption including, without limitation, with intermediaries. An intermediary can be a broker or consultant or any other third-party with whom we engage to obtain information or services related to our business endeavors. This Policy defines how Elior North America will ethically engage with intermediaries in accordance with applicable laws, Elior North America's Integrity Guide and Elior Group Integrity Policy.

2. Objectives

This Policy is designed to help team members lawfully engage with intermediaries 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 Policy for Engaging with Intermediaries may be subject to disciplinary action, up to and including termination.

3. Responsibilities

Entering into a business relationship with an intermediary should be done with caution and transparency. It is strongly recommended that anyone seeking to engage the services of an intermediary consult with the segment president or Elior North America CEO to identify the circumstances that would necessitate involvement of an intermediary.

Entering into an agreement with an intermediary is permissible provided that all engagements are made at arms-length, are in line with market expectations, and do not create unlawful conflicts of interest. Elior North America's Standard Legal Agreement must be used in all intermediary agreements. This contract 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.

Every Elior North America team member should be aware of the risks that can arise out of the engagement of an intermediary—including financial, legal and reputational risk.

Governmental Agencies can conduct audits or inspections that will require a detailed review of Elior North America's intermediary relationships to ensure they meet all applicable legal and ethical standards. In order to properly prepare for any such investigation or audit all intermediary relationships must be reported and Agreements must be provided to the Elior North America compliance department and will be included in a single database that can be easily reviewed.

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



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