

September 2023

Quality of Life in Business and Beyond

Sodexo Australia Pty Ltd
Modern Slavery Statement



Contents

P3

Introduction

P4

About our Business

P6

Our Corporate Social
Responsibility and
Supply Chain

P8

Our Principles, Policies
and Approach

P10

Due Diligence

P12

Assessment and
Management of
our Suppliers

P15

Our Effectiveness
and Training

P18

Looking to the Future

Tackling Modern Slavery

Sodexo Australia Pty Limited, Sodexo Remote Sites Australia Pty Limited and IFM Services Pty Ltd (together, “Sodexo”) is a people business. Every day our people across Australia strive to develop, manage, and deliver a diverse range of services designed to create a better every day for everyone to build a better life for all.

Our relationships and responsibilities are a part of Sodexo’s global business with a significant supply chain connecting us with over 2000 suppliers.

We are proud to be part of a company that shares the same principles as those set out in the *Modern Slavery Act 2018* (Cth). We believe in the elimination of all forms of compulsory labour and work to ensure slavery and human trafficking does not take place in any part of our business or supply chain.

Sodexo SA, Sodexo’s parent company, headquartered in France, is a signatory to the UN Global Compact, signatory to the G7 Business for Inclusive Growth (B4IG) coalition, partner of the OECD, respecting all human rights, including the right of people to be free from involuntary or forced labour as set forth in the International Bill of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

As you will see in this Statement, we are showing our commitment through actions consistent with our position as a world leader respecting human rights within our business, supply chain and beyond.

This statement outlines our key commitments across the business, including our supply chain, our principles, policies, approach, due diligence, effectiveness and training, and our view looking to the future.

We must all play our part in upholding human rights and combatting Modern Slavery. Therefore, we must be vocal in our commitment to safeguarding the highest standards of ethical conduct across our business and beyond.



Keith Weston
Managing Director
Sodexo Australia

About our Business

“Sodexo was created in 1966. Today, we are the global leader in sustainable food and valued experiences at every moment in life. We believe in creating a better day for everyone to build a better life for all. Whether you’re looking for key figures or our in-depth mission – this is who we are.



Reporting Entity:

Sodexo Australia Pty Ltd, Sodexo Remote Sites Pty Ltd and IFM Services Pty Ltd are subsidiaries of the Sodexo Group, our parent company Sodexo SA, headquartered in France.

ABN: 50 006 072 975
47 009 105 980
28 608 575 668

Website: www.sodexo.com.au

Founded in Marseille in 1966 by Pierre Bellon, Sodexo is the global leader in Quality of Life Services, an essential factor in individual and organisational performance.

Operating in 45 countries, our 430,000 employees serve 80 million consumers each day. Sodexo Group stands out for its independence and its founding family shareholding, its sustainable business model and its portfolio of activities including Food Services, Facilities Management Services and Employee Benefit Solutions.

From day one, Sodexo has been focusing on tangible everyday gestures and actions through its services to have a positive economic, social, and environmental impact over time. For us, growth and social commitment go hand in hand. Creating a better every day for everyone to build a better life for all is our purpose.

Sodexo was established in Australia in 1988. Sodexo in Australia employs a diverse workforce of nearly 4,000 employees. Sodexo delivers a unique array of over 100 integrated services lines, including cleaning, catering, facilities management, aerodrome services, concierge, security, asset and building maintenance and hospitality services in the following segments: Corporate Strategic Accounts and Energy & Resources, both on and offshore.



Our Corporate Social Responsibility and Supply Chain

The Australian Supply Management function is part of a Regional and Global Sodexo Supply Management team that have established strategic directions in Corporate Social Responsibility (CSR) across the Supply Chain.

Our CSR framework consists of strategic pillars that direct our Supply Chain efforts:

- Ensuring health & wellbeing: improving the health and wellbeing of workers and consumers
- Fostering social equity: enriching the livelihoods of millions of people
- Protecting and restoring natural ecosystems: aimed at achieving a carbon neutral supply chain.

Within each of these pillars, we have a series of related topics and ambitions associated to the achievement of these goals.

Within the 'Foster Social Equity' pillar, resides our commitment to compliance and ethics where we pursue the ambition of *ensuring fair, equal, and ethical business practices throughout our supply chain*.

This guiding ambition is where we have established our approach towards Modern Slavery under the UN Guiding Principles on Business & Human Rights.

Within all reporting entities in Australia, we have aligned our efforts, ensuring our Supply Chain processes are compliant with a focus on continuous improvement.

Risks identified within the supply chain process:

▪ Food Supply Chains

Our Food Supply Chains consist of managing stakeholders – from the farmer, processor, wholesalers to the distributor. We want to ensure that from the person picking the fruit, to the final supplier in the chain, we are not engaging in modern slavery.

▪ Facilities Management Suppliers

We engage with a range of FM suppliers to undertake work on our behalf. Certain sectors may present a potential area of exposure.

▪ Employment Service Suppliers

Recruitment and labour-hire suppliers may pose a risk if they have poor governance structures or a record of treating workers poorly.

Our efforts to date have centred upon the following:

▪ Awareness:

We have undertaken activities to increase the awareness of Modern Slavery within the community and to ensure we establish mechanisms and governance within our Supply Chain.

▪ Contractual Compliance:

Within every agreement established with reputable suppliers, we ensure compliance to the *Modern Slavery Act 2018* (Cth) as a non-negotiable clause that we require all suppliers to adhere to. Fundamentally, the Sodexo Supply Chain team will not engage with a supplier that departs from its requirement. To date, all suppliers we have engaged with have been supportive of this direction.

▪ Retroactive Compliance:

For suppliers that have pre-existing agreements with Sodexo, we have undertaken a program where suppliers acknowledge their compliance to the *Modern Slavery Act 2018* (Cth) through an online statement of compliance. This ensures all suppliers that Sodexo engages with align to the requirements of the Act. It will also serve as a reference point when new agreements are established, whereby, they are aware of the requirement.

Going forward, our focus will include:

▪ Supplier Communication:

Modern Slavery will form a key element of our supplier engagement and communication forums. The objective is to establish a community of awareness by sharing exemplary examples of what our suppliers are doing to promote Anti-Modern Slavery.

▪ Supplier Engagement & Auditing:

As part of the supplier engagement activity, we will be undertaking a series of audits to ascertain the level of compliance that exists within the supply chain. The initial part of the strategy will be procedural compliance, and then evolve to audit of work practices associated to ensure instances of Modern Slavery do not exist with standards of operating developed for a reference point across the supply chain.

▪ Sodexo Global & Regional Information Sharing:

We will expand our engagement and leverage upon the work at a global and regional level where assessments of suppliers relating to Modern Slavery is undertaken. This insight will be included into our forward-looking procurement strategies whereby local suppliers will be held accountable for instances of Modern Slavery within their global organisations.

Our Principles, Policies and Approach

Sodexo's policies reflect our commitment to acting ethically and with integrity in all our business relationships. We continue to implement and enforce effective systems and controls to address and avoid slavery or human trafficking in our supply chain. The following policies, and supporting guidance, are relevant to slavery and human trafficking, and are available on request:

- Sodexo Policy on Human Rights
- Sodexo Charter Concerning Fundamental Rights at Work
- Sodexo Statement of Business Integrity
- Code of Ethics
- Sodexo Whistleblower Policy
- Supplier Code of Conduct

Our policies are accessible to all employees via the external website www.sodexo.com.au as well as our internal employee intranet.

The Fundamental Rights at Work Charter specifically addresses forced labour and is supported by training modules with clear expectations of employees.

Our pre-employment on-boarding program provides all new starters with referencing Sodexo's policies.

Our policy statements affirm the expectation of our employees and workers to maintain certain standards relating to the code of ethics, as well as Sodexo's commitment to guaranteeing that slavery and human trafficking does not take place in any part of our business or supply chain.

All managers are notified of any changes to the policies via an electronic brief. They are required to cascade updates to all team members who do not have access to our internal communication channels. Sodexo's operational, non-office-based managers have access to a range of HR guidance and policies from a dedicated website, accessible from outside of the Sodexo IT network.

Complaints and concerns raised by employees, whether via the whistleblower portal or otherwise, are managed and monitored by the Responsible Business Conduct and Ethics Committee. This group is chaired by the HR Director and comprised of the Chief Financial Officer, the General Counsel, and the Head of Internal Audit.

The Committee monitors the status of any matters raised and the actions taken, policies, training, and trends. The Committee reports periodically to statutory directors as well as a regional Ethics Committee.

Supplier Code of Conduct

Sodexo's Supplier Code of Conduct outlines standards of business integrity, fundamental human rights including Modern Slavery, as well as health, safety, environment, and quality standards each supplier must meet prior to engagement with Sodexo. This document forms the basis of supplier evaluations which include self-assessments, Sodexo audits and third-party audits.

The Sodexo Management System outlines the requirements for supplier engagement at site level. All suppliers are required to adhere to these standards on a continuous basis as a condition of their supply agreement. These standards are monitored throughout the duration of the contract.

Suppliers are expected to provide information such as proof of insurance, accreditation, and their Health & Safety Policy. Suppliers are required to demonstrate competence within their field of expertise, such as via accreditations to relevant bodies or a demonstration of similar activity with existing clients.

Sodexo requires suppliers to sign up to our Supplier Code of Conduct or to provide evidence that they have a similar code in place governing their organisation. The Supplier Code of Conduct sets out specific expectations that suppliers avoid and address slavery and human trafficking in their operations and in their own supply chains. The code is continually reviewed to reflect the changing needs of our business and any fundamental changes to legislation not covered.

The Sodexo Supplier Code of Conduct can be referenced [here](#)



Due Diligence

Sodexo Australia manages risks across the company through a combination of policies, procedures, training, and committees which monitor incidents and report directly to the Country Leadership Team. As part of our initiative to identify and mitigate slavery and human trafficking risk, we have in place systems to:

1. Identify and assess potential risk areas in our supply chain.
2. Mitigate the risk of slavery and human trafficking occurring in our supply chain.
3. Monitor potential risk areas in our supply chain.
4. Protect whistleblowers.



We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our standards, we have in place a supplier governance framework. This consists of various elements including:

- > A supplier governance mechanism that requires due diligence to be completed and declared by the respective procurement manager. All supplier agreements go through four levels of endorsement and approval, and potentially a further three levels should the agreement deviate from terms.
- > Sodexo uses a 'pre-qualification' process to assess suppliers against the Supplier Code of Conduct. The level of initial assessment and on-going monitoring relates directly to the products provided or the activity the supplier will be performing and the associated risk. The structure for both the initial and on-going assessment is detailed in governance protocols for both food and non-food suppliers.

The supplier pre-qualification process includes questions relating to the *Modern Slavery Act 2018* (Cth) and the steps being taken by the suppliers with regards to compliance.

- > Assessment of supplier suitability is carried out by professionals who are independent from the day-to-day operational management of the suppliers they evaluate. In cases where a supplier fails an initial assessment, a secondary assessment may be undertaken subject to further discussions with Sodexo's purchasing department and internal audit team.
- > Sodexo uses centralised tracking of certification and documentation validity via Rapid Global. As supplier qualifications reach their end date, the governance function is prompted to request new documentation from the supplier.
- > Ongoing communication and engagement with suppliers to inform them of any changes and to reinforce Sodexo's commitment to progressively eliminate Modern Slavery risks within our operations and supply chains.



Our Effectiveness and Training

Sodexo Australia directly employs nearly 4,000 people. We are extremely proud of the diversity and gender balance of our workforce, with a 48% to 52% female to male ratio.

To ensure our commitments outlined in this Statement remain top of mind throughout our business and workforce, we must continuously measure the effectiveness of our approach and provide regular training for our employees.

Effectiveness

These policies are included in annual controls testing performed by the control and compliance team.

Testing includes the areas of ethical values, disciplinary measures, whistleblowing, fundamental rights at work, reporting, correcting deficient procedures and controls, HR policies and procedures, identifying business risks, definition, and review of key performance indicators, supply management engagement with suppliers and sub-contractors, incident reporting process, approval of time worked and authorisation of overtime, screening employees and buyer

conduct.

Test results are reported at regional and group level, including Sodexo Group internal audit. Where deficiencies are identified, appropriate remedial actions are raised, and progress monitored and reported to the regional leadership committee.

Our target for mandatory training compliance is 100%. 100% of our employees employed prior to 2022 complete the training, which has since been included in Sodexo's Onboarding training for all new starters.

Completion of mandatory training is proactively monitored weekly to drive follow up activity to maintain this high level of compliance.

Our Effectiveness and Training

Training

Our HR team has worked closely with Sodexo Group representatives to ensure a coordinated approach to continue integrating and embedding respect for human rights globally throughout our organisation.

Our commitment to responsible business conduct and the promotion of fundamental human rights is the cornerstone of our onboarding and ongoing professional development programs.

In 2011, Sodexo created the Group Charter concerning the four Fundamental Rights at Work. In response, we implemented a company-wide requirement for all Sodexo employees in managerial and supply chain roles to complete the mandatory training course on Fundamental Rights at Work.

The training covers Fundamental Rights at Work, elimination of forced or compulsory labour, abolition of child labour and elimination of discrimination. Attendees can then apply their knowledge of Sodexo's Charter on Fundamental Rights at Work to their day-to-day roles. This training is mandatory for all new starters in relevant roles.

Responsible Business Conduct and Ethics are explored in a more business sense through Anti Bribery and Corruption and Conflict of Interest, and Acceptable Workplace Behaviours training modules. Targeted at managers during their first onboarding, this training ensures employees understand their requirement to represent Sodexo responsibly, ethically, and legally.

Speak Up is Sodexo's 'whistleblowing' reporting service for unsafe, unethical or behaviour contrary to our Code of Conduct. Sodexo employees, contractors and external partners are able to report instances of serious wrongdoing and misconduct including issues related to fundamental rights at work and Modern Slavery. Matters raised are overseen by the Responsible Business Conduct and Ethics Committee.

Employees are also required to take mandatory refreshers annually prompted through our eLearning system. The Conflict of Interest module and accompanying Conflict of Interest Declaration process ensures any changes in circumstances are visible to both the regional Ethics committee and locally for Legal and Internal Audit review.



Looking to the Future

Following our ongoing reviews, we are confident that there is no slavery or human trafficking in our supply chain.

We intend to conduct a scoping exercise to further examine risk areas in our operations and supply chain.

A periodic review of the measures in place will take place to reflect our progress in subsequent annual statements.

This statement was approved by the Sodexo Australia Country Leadership team as the principal governing body of the reporting entities on 30 September 2023.

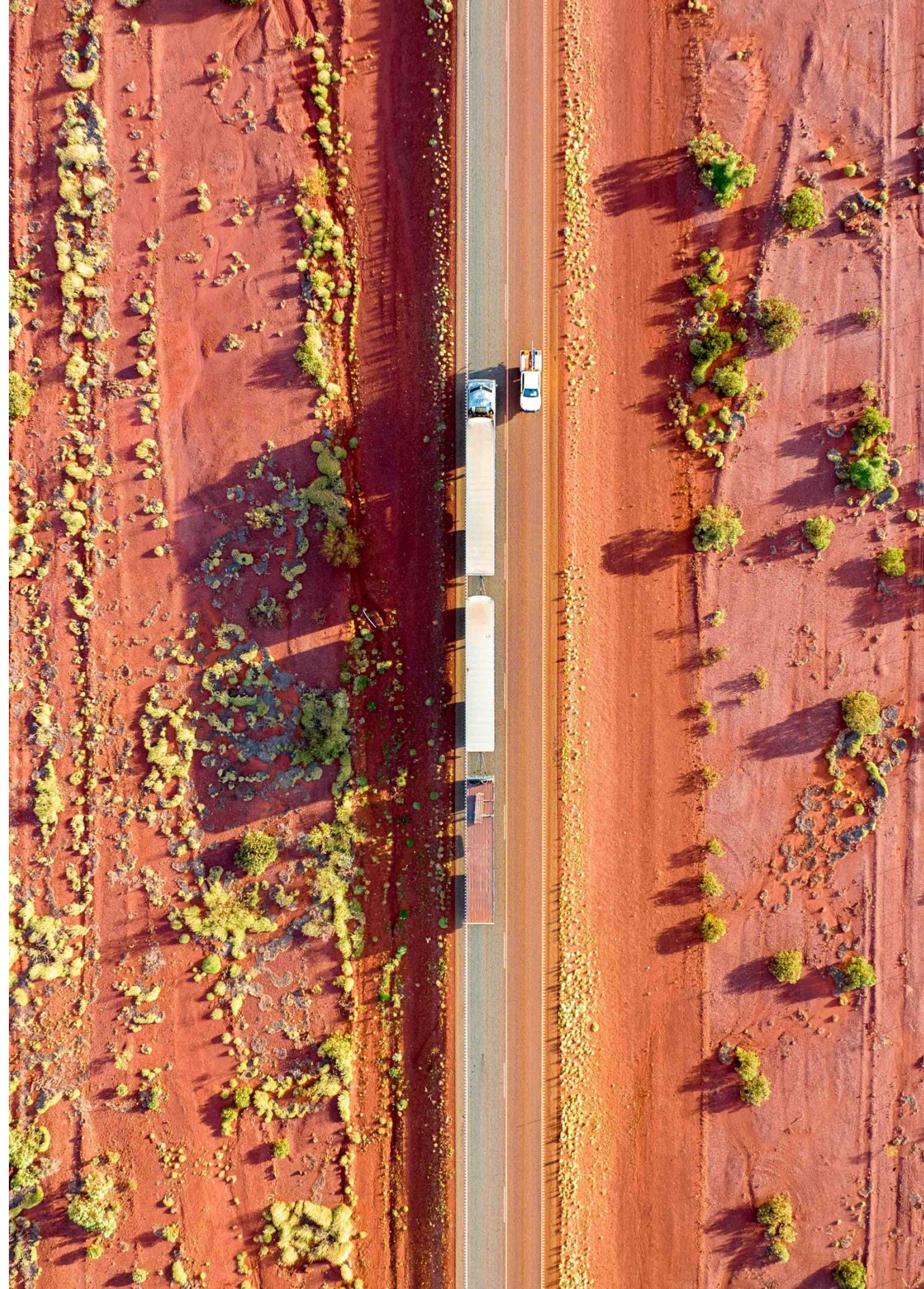
Signed,



Keith Weston
Managing Director

Sodexo Australia Pty Limited
Sodexo Remote Sites Australia Pty Limited
IFM Services Pty Ltd

Dated 30 September 2023



Sodexo

607 St Kilda Road
Melbourne
VIC 3004
Tel: 1 800 SODEXO
www.sodexo.com.au