



RESPONSIBLE BUSINESS CONDUCT

We are **ALL** responsible



Business Integrity Guide

sodexo
QUALITY OF LIFE SERVICES



RESPONSIBLE BUSINESS CONDUCT

We are ALL responsible

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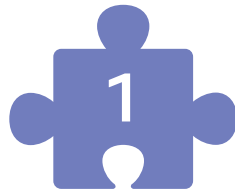
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ALWAYS DOING THE RIGHT THING

We are ALL responsible

Conducting all aspects of Sodexo's business with the highest standards of ethics and integrity is essential to Sodexo's mission to improve the quality of life of our employees and of all whom we serve and to contribute to the economic, social and environmental development of the communities, regions and countries where we operate. Business integrity is critical to our success and helping us achieve that mission. That's why it's a fundamental pillar of our Responsible Business Conduct commitments.

This document sets the standards we expect from our people; whether you are a senior leader, an executive or a frontline employee.

It's important you understand the important role you play in helping us to maintain our reputation as a responsible business... Why? Because "we are all responsible".

We operate a complex business; working in many different countries and cultures. However, the principles in this document are consistent across our entire business.

We all have a responsibility to understand these principles, follow them to the letter and ensure we use good judgement, not only to ensure we are legally compliant, but to ensure we always do the right thing; that we are ethical, fair and a good corporate citizen. It makes us who we are.

We will comply with all applicable laws wherever we operate.

As well as complying with the principles outlined in this document, we are all responsible for adhering to Sodexo's policies and procedures and respecting the laws and regulations specific to the countries in which we operate.

If you are ever unsure, please speak to your legal department. And importantly, if you ever suspect any wrong doing or failure to comply with our Code of Ethics, the law or our policies and procedures, speak up.



Employees are responsible for understanding and complying with our Business Integrity Statement and to raise concerns or report promptly any suspected violations of laws or Sodexo policies.

Failure to abide by this Statement or other Sodexo policies may result in disciplinary action including termination of employment in accordance with local laws and applicable collective bargaining agreements.

Employees should report promptly any violations of law or Sodexo policies of which they become aware and raise issues or concerns as soon as they arise. Sodexo will provide mechanisms for employees and other stakeholders to raise concerns related to business integrity. All reports should be made in good faith. Reports will be treated seriously and confidentially to the fullest extent possible. Employees making such reports will not be subject to retaliation, threats or harassment, and their identity will be held in confidence to the extent possible and as permitted by law.

The issues raised in this Statement are often complex, and there may be no simple answers or solutions. Unforeseen circumstances will arise in a business as dynamic and wide-ranging as Sodexo's. We will provide employees with the resources and support to achieve these standards of business integrity, including guidance to explain the standards described in this Statement and practical tools to help employees apply our principles to our business. In addition, other parts of the business may choose to issue additional guidance on the application of this Statement to their particular situations.





THESE STANDARDS APPLY TO ALL

**THESE STANDARDS APPLY TO ALL SODEXO EMPLOYEES
AND TO ANY PERSON ACTING ON OUR BEHALF**

Sodexo employees, consultants and other persons hired to act on our behalf are expected to comply with these standards, and any person using consultants or others to act on Sodexo's behalf must take steps to ensure that such persons agree to comply with them. All consultants or other representatives shall be subject to due diligence to ensure they do not have a history or reputation for unethical behavior. Sodexo employees must not seek to do indirectly through others what they may not do directly.





Foreword by
Sophie BELLON:

// Treat others as you would like them to treat you. //

Sodexo's mission is to Improve Quality of Life and to contribute to the economic, social and environmental development of the communities, regions and countries where we operate. Our employees are committed to the historical values of Service Spirit, Team Spirit and Spirit of Progress, and to the ethical principles that guide us in our day-to-day business. Sodexo is, and must continue to be, a company that employees, customers, clients and other stakeholders can trust. Those who work for and with Sodexo should always be respected and confident about the integrity of their relationship and engagement with Sodexo. Each and every employee is expected to comply with our business integrity standards, understanding that violations of these standards are grounds for disciplinary action and may even be against the law. I hope this document helps you to do your part and to feel supported as you do the right thing.

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Foreword by
Denis MACHUEL:

**// We are evaluated not only on what we do
but also on how we do it. //**

All of us should live according to the ethics and values embedded in this document. Not only the rules, but also the spirit and values behind them.

The principles in our Code of Ethics are not new. Sodexo employees already live by these standards in their everyday lives and within their communities.

However, it is critical we maintain our focus on being a responsible business, which is why this document has been produced; to give you practical advice and guidance in the light of an increasingly complex global and multi-cultural workplace. If you ever find yourself in a difficult ethical situation, or wonder whether a colleague is living up to Sodexo's standards, please seek guidance from your manager, legal department or HR. If your concern cannot be handled through these channels, you can raise any concerns through our online grievance platform. We will always respect you and protect you for having the courage to live our standards.

Our Values

This is what we value first, foremost and without exception:
Sodexo will live by its values and ethical principles.



SERVICE SPIRIT

- Clients and consumers are at the center of everything we do.
- To serve them well on a daily basis, we have to demonstrate our availability and responsiveness, to anticipate their expectations and to take pride in satisfying them.
- Sodexo has become a global company but we remain locally-focused; our managers in the field are true entrepreneurs, close to their clients and empowered to make decisions.

TEAM SPIRIT

- It is an absolute need in all of our operations, our business units and administrative offices, as well as in our management committees.
- Each person's skills combine with other team members' knowledge to help ensure Sodexo's success.
- Teamwork depends on the following: listening, transparency, respect for others, diversity, solidarity in implementing major decisions, respect for rules and mutual support, particularly in difficult times.

SPIRIT OF PROGRESS

- Our will, but also the firm belief that we can always improve on the present situation.
- Acceptance of evaluation and comparison of our performance with that of our colleagues or competitors.
- Self-assessment, because understanding our successes as well as our failures is fundamental to continuous improvement.
- A balance between ambition and humility.
- Optimism, the belief that for every problem there is a solution, an innovation or some way to progress.

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Our Ethical Principles



LOYALTY

A foundation of loyalty, shared by Sodexo with its clients, employees and shareholders, based on honest, open relations. Loyalty is one of the cornerstones of operations in our organization.

RESPECT FOR PEOPLE

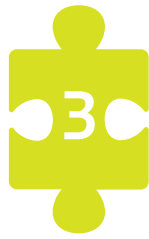
Humanity is at the heart of our business. Sodexo is committed to providing equal opportunities, regardless of race, origin, age, gender, beliefs, religion or lifestyle choices. Improving quality of life means giving each person respect, dignity and consideration.

TRANSPARENCY

This is one of Sodexo's major principles and a constant with all stakeholders: clients, consumers, employees, shareholders and the general public.

BUSINESS INTEGRITY

We do not tolerate any practice that is not born of honesty, integrity and fairness, anywhere in the world where we do business. We clearly communicate our position to our clients, suppliers and employees and expect them to share this rejection of corrupt and unfair practices.



FAIRNESS AND HONESTY AT OUR CORE

WE WILL DEAL FAIRLY AND HONESTLY
WITH ALL OUR STAKEHOLDERS

Sodexo will deal honestly and fairly with all our stakeholders, including our employees, clients, customers, partners and suppliers. This means we will honor our contractual commitments and uphold both the letter and spirit of our business arrangements. This also means that we will treat our employees fairly and we will comply fully with all applicable laws prohibiting discrimination against and providing protections to our employees and customers.



SUPPLIERS

What you can expect:

- Sodexo is committed to conducting itself with the highest standards of business integrity.
- Sodexo does not tolerate any practice that is inconsistent with the principles of honesty, integrity and fairness, anywhere in the world where we do business.
- Sodexo makes efforts to ensure fairness in the procurement process and, as a result, partners with other ethical suppliers across our supply chain.
- Sodexo will not engage in any acts of unfair competition and will not engage in bribery in any form.
- Sodexo will provide its employees with guidance and training on how to engage with suppliers, vendors and other third parties.
- Sodexo will provide a Supplier Code of Conduct to ensure everyone has the same expectations.

What is expected of you:

- Obey all applicable laws and regulations.
- Make decisions based on legitimate business considerations.
- Follow standardized process to ensure fair selection of suppliers, vendors and consultants.

- Ensure all our suppliers comply with our ethical standards as reflected in the Supplier Code of Conduct.
- Report financial conditions and results of operations honestly and promptly.
- Deal honestly and fairly with clients, customers, suppliers and financial partners.
- Avoid actual and potential conflicts of interest.
- Avoid the improper giving and/or receiving of gifts.
- Safeguard Sodexo's assets.
- Protect confidential and proprietary information.
- Protect Sodexo's reputation.
- Separate personal political activities from Sodexo's business.
- Report observed violations of all applicable laws and regulations and ethical standards.

Something to think about:

- **Do you have a conflict of interest with the supplier?** For example, if the supplier's representative is a friend or family member there could be a conflict of interest in the negotiation process.

- **Have you or your family been given gifts by the supplier?** If the supplier has provided you with gifts and entertainment that can be seen as a conflict of interest because you might be more likely to give concessions. In some countries providing gifts and entertainment can be illegal, even in private commercial dealings, if there is a intention of bribery.
- **Has the supplier treated you or your family to entertainment such as dinners or outings to a sporting event?** If the supplier does not provide you with gifts and entertainment directly, but does so to family members, then that can also be a conflict of interest and potentially against the law.
- **Is there anything, other than business considerations, that might affect your decision making?** Ultimately, you must make decisions regarding suppliers on what is in the best interest of Sodexo and not you personally.
- **Did you take any shortcuts in the bidding process or forget to go through legal for your agreement?** The reason that a formal process exists to engage with suppliers is to ensure fairness and to use a contract to document the transaction. If you bypass the process for contracting with a supplier, you open yourself and Sodexo to risk.



PRACTICAL ILLUSTRATIONS:

I am trying to find a new supplier for office materials. The first one I contacted offers a good service, but at a high price. The second isn't quite as good, but they are cheaper (mainly because a significant discount was made in an effort to win Sodexo's business). Can I tell the first supplier what price the second supplier quoted, in order to try to get their price down?

You should keep your conversation with the first supplier in very broad terms. What information is revealed depends on a number of factors, for example contractual limitations, such as bid language and potential nondisclosure agreement or local laws that can limit what information can be shared. It is best to state that you have a better price elsewhere, but without revealing the identity and price of the second supplier. You should be careful of giving the first supplier confidential information about the competitor. This kind of practice could be deemed to be unethical and, in many countries, against the law.

If the supplier has provided you with gifts and entertainment that can be a conflict of interest because you might be more likely to give concessions. In some countries providing gifts and entrapment can be illegal, even in private commercial dealings if there is a determination of bribery.

Someone told me confidentially that one of our overseas suppliers is under investigation following allegations of forced labor. The supplier hasn't told me any of this, and on previous site visits there's been no reason for concern. Should I ignore these rumors?

Absolutely not. Sodexo is committed to conducting business only with ethical suppliers. An investigation should be conducted in a timely manner and you should get help to investigate the issue. Bring this situation to the attention of your manager, so that legal or another appropriate resource can address this concern at the right level within the team. If you feel like your concerns are being ignored, then consider escalating to the Sodexo Speak Up platform. If the investigation reveals there is scope for improvement, the supplier will be informed and a corrective action plan will be negotiated. Of course, in case of severe non-compliance with our standards which we do not think we can fix immediately or if the supplier does not improve, we must end the relationship.

CLIENTS

What you can expect:

- Sodexo will honor contractual commitments and uphold our business arrangements.
- Sodexo will treat employees fairly and will fully comply with all applicable laws prohibiting discrimination against employees and customers.
- Sodexo has a responsibility to maintain the very highest standards of integrity in business practices with all stakeholders.

What is expected of you:

- Always honor contractual commitments and uphold business arrangements.
- Always make business decisions based on legitimate business needs.
- Never tolerate conduct by a business partner that would not be acceptable conduct for Sodexo or our employees.
- Do not discriminate against anyone on any improper basis.
- Always make human resources decisions based on business considerations and in accordance with applicable employment laws.
- Always adhere to relevant health rules and Sodexo safety policies.

PRACTICAL ILLUSTRATIONS:

You are working on a project in which Sodexo is partnered with a local firm to provide food services to oil workers. Most of the client's employees belong to the country's majority ethnic group. There have been a few incidents in the dining hall, leading to temporary food service disruptions, when these workers scuffle with members of a smaller ethnic group. One day, you're told that to avoid this kind of disruption the joint venture isn't going to allow the minority group workers to use the dining hall. Even though we don't control the joint venture, should you do something?

Yes. Discriminating against customers or anyone else on the basis of factors like ethnic origin is contrary to Sodexo's principles. You should bring this situation to the attention of your manager, so that the appropriate person can discuss this at the right level within the joint venture.

As a regional manager, you have been asked to find affiliates for a new Motivation Solutions program. A friend of yours owns and manages one of the businesses that you are considering, a grocery store. Can you consider your friend's business as a potential affiliate? What should you do if you choose your friend's business?

Yes, you can consider your friend's business as a potential affiliate. However, you should avoid any potential conflict of interest or an appearance of impropriety. You should make the decision exactly as you would make any other business decision for Sodexo, based on legitimate business needs such as the quality of the products and services offered, and not on personal considerations like your friendship. Partner with a colleague to research your friend's company as thoroughly and critically as any other, and to make a recommendation.

If, in the end, you decide to recommend your friend's business as an affiliate, you must explain to your supervisor that the owner is a friend, but that you believe his business is the best fit for Sodexo, and be prepared to explain why. It is always important to disclose any personal relationship before the business decision is taken, so that there is no question, after the fact, that the reason for your recommendation could be called into question and to implement additional safeguards, as appropriate, to prevent even the appearance of favoritism.



EMPLOYEES



Sodexo has **10** people fundamentals, which have an important impact on the quality of life of our employees. Those fundamentals include:

1. Safe, secure and healthy workplace
2. Respectful workplace relations: no harassment, bullying, threats, or violence
3. Training, tools and equipment for competent and safe job performance
4. Clear management: missions and objectives
5. Respect for fundamental rights at work
6. Full pay: on time every time
7. Fair schedules: within legal maximum with proper days off and rest breaks
8. Data privacy and security for personal information
9. Proper and dignified living accommodation (where provided)
10. Voice: meaningful grievance mechanisms protected from retaliation

What you can expect:

- Sodexo promotes a "zero accident" culture. That means, wherever we operate, Sodexo complies with all relevant health and safety rules, codes and policies in each of our activities.
- Sodexo is committed to ensuring that everyone is treated with respect in the workplace.
- Sodexo will take a "zero tolerance" approach to acts of bullying, harassment or violence in the workplace. Any act or threat will be taken seriously, investigated immediately, and addressed appropriately. If it is necessary, Sodexo will encourage police intervention and pursue criminal charges.
- If you are a victim of violence, and suffer physical or mental trauma as a result, Sodexo will support you in your recovery.
- Sodexo will ensure there are written job descriptions to inform all employees of their duties. All managers have clear objectives.
- Sodexo's commitment to respect human rights is informed by international human rights principles. These principles are set forth in the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Global Compact.
- Sodexo is committed to respecting the right of employees to join the trade union of their choice, free from any form of retaliation that might impair their ability to exercise rights of freedom of association and collective bargaining.
- No Sodexo employee will be expected to work or perform other services under the threat of punishment.
- Sodexo will not employ anyone under the age of 15, except in the case of apprenticeships or internships as part of a recognized professional training program. In countries where the legal minimum working age is above 15, Sodexo will respect local laws.
- Sodexo will only hire employees based on the criteria of qualifications, competencies and professional experiences. These criteria also apply to compensation, working conditions, promotions, mobility and training.
- Sodexo fights against discrimination of any kind with regard to employment and promotes diversity and inclusion in compliance with local laws.
- Sodexo ensures all employees are paid on time every time (salary and all compensations).
- Sodexo will ensure that schedules comply with applicable laws, do not require employees to work excessive hours, and provide appropriate periods for meals, breaks, and time off.
- Sodexo will only collect personal data as is necessary. When data is collected, it will be managed securely.
- Where Sodexo provides employees with accommodation, it will be proper and dignified.
- The Sodexo Speak Up platform allows you to raise concerns you may have regarding the respect of the Sodexo Code of Business Ethics in a safe and confidential environment.
- We will ensure a fair process in the case of an investigation, respecting the principles of confidentiality and presumption of innocence. Any investigation will also comply with applicable local legislation.

**What is expected of you:**

- Always work free of the influence of any substance that might impair judgment or performance.
- Actively promote our safety culture and follow our health and safety standards and processes.
- Report accidents, injuries and unsafe equipment, practices or conditions to a supervisor or other appropriate person promptly.
- Treat others as you would like them to treat you with courtesy, dignity and respect.
- Never threaten anyone with physical, psychological or verbal violence.
- Never behave in a way that could be intimidating, offensive, malicious or disrespectful.
- Wear proper items of personal protection equipment when required, and request replacements if the equipment is damaged.
- Request training in case of doubt on capabilities and competencies to ensure services are delivered safely.
- Recognize and respect differences in culture and beliefs.
- Report any violation of the fundamental rights at work to a supervisor, HR contact or other appropriate person promptly.
- Make sure you respect our data privacy statement.
- Report any violation of this commitments to a supervisor, HR contact or other appropriate person promptly.
- If your concern cannot be handled through normal channels report any violation via the Sodexo Speak Up platform.

PRACTICAL ILLUSTRATIONS:

As a sales representative, I often drive after dark in large cities and rural areas. Sometimes, I don't feel safe. I have raised the security issue with my manager but he has not acted on my concerns. Should I take this up with someone else in the company?

Yes, you should consult your HR Manager in order to discuss possible solutions to avoid this kind of situation.

My manager can be highly intimidating. I know he's pushing us hard to deliver quality work, but at times he can really humiliate people, and it's affecting the morale of the whole team. Is there anything I can do about it?

Sodexo managers are expected to challenge and drive their team to deliver the quality of work that is required by our clients. This may mean that she will criticize or comment on team members' performance. However, a manager is also expected to treat team members with respect and dignity. If you feel that you are not being treated in a professional manner, you should try and speak to your manager. You can also reach out to your HR Manager.

What should I do?

My district manager has instructed me to disable a safety device.

You should never bypass, disconnect or disable any safety device or monitoring equipment without the proper prior approval from a safety representative. If your district manager insists, you must refuse and inform the site management and your HR manager. Safety is an absolute commitment that should not be compromised.

At a university, a big event is planned at the beginning of the semester for incoming students. To meet the rush, the unit manager is away from the kitchen supervising another unit and you observe that employees are working without required breaks. Even though it's a one-time event and the goal is to make the event a success, should you report these violations to the unit manager?

Yes. The unit manager knows that part of making the event a success means making sure conditions are safe. You should always make sure you and your colleagues adhere to our health and safety practices. It is important to let your unit manager know if these policies are not being followed.

Yes. The unit manager knows that part of making the event a success means making sure that conditions are safe and healthy. We also protect Sodexo's reputation by always following the rules for health and safety, even when it seems unnecessary for a short-term goal. You should always make sure that you and your colleagues adhere to standard health and safety practices. It is important to let your unit manager.



WE WILL NOT TOLERATE BRIBERY OR CORRUPTION

**WE WILL WIN BUSINESS BASED ON MERIT,
NOT THROUGH BRIBERY AND CORRUPTION**

Sodexo wins business based on the strength and quality of our services. Neither Sodexo nor anybody acting on our behalf will give gifts or other things of value to public officials or to private parties to obtain a business advantage. Whether dealing with government officials, private customers or prospective clients, we will not give gifts, provide entertainment or make improper political contributions in order to influence a decision relating to Sodexo, obtain a contract or gain any improper business advantage. Likewise, Sodexo employees shall not accept gifts or entertainment from a supplier or prospective supplier in return for business or better pricing or any other improper business advantage.

In all cases, Sodexo employees must be guided by Sodexo's standards of integrity and honesty. Therefore, Sodexo employees should avoid even the appearance of improper action, and not accept, offer or give any gifts or entertainment that might compromise their actions, influence others or otherwise reflect negatively on Sodexo.

Certain limited gifts and business entertainment may be permissible within our standards of business integrity. Sodexo employees may generally offer or provide gifts, entertainment or other things of value to a private party when they are modest in value, consistent with all applicable laws and local business practices, and are not offered to gain an improper advantage.

Gifts or entertainment that may be permissible for a non-governmental customer may be illegal or unethical when dealing with public officials. For example, some governments have rules prohibiting their employees and officials from accepting anything of value from the public, which may include paying for an official's travel or hotel accommodation or a single meal. In some countries, businesses may be controlled by the government, making it difficult to distinguish between commercial and government officials. Therefore, employees must take particular care when dealing with public officials.



What you can expect:

- Sodexo will not participate in any form of corrupt behavior, either directly or indirectly, anywhere in the world.
- Under no circumstances will Sodexo approve any irregular payment or payment in kind to win business, encourage others to act improperly or influence a decision in their favor.
- Sodexo will not make facilitation payments and will not allow others who work for us or represent us to make them.
- Sodexo will take disciplinary action and, where appropriate, take legal action if you give or take bribes, or engage in or condone any form of corruption.
- Sodexo will conduct background checks on all consultants and agents used.
- Sodexo will insist that the policy on corruption, bribery and facilitation payments is followed by business partners, including joint ventures, agents, contractors and suppliers.

What is expected of you:

- Always work free from the influence of any substance that might impair judgment or performance.
- Do not accept, offer or give gifts or anything of value in order to obtain a business advantage or for the purpose of influencing. You may generally offer or provide gifts, entertainment or other things of value when they are modest in value, consistent with applicable law and local business practices and are not offered to gain an improper advantage.
- When dealing with contractors, look out for warning signs of potential corruption on their part. Please pay attention to:
 - > the contractor's local reputation (determine whether the person who is a prospect, client or a business partner of any kind is a public official)
 - > contracts, which should clearly stipulate what each party is required to do
 - > terms for the payment of commission in agreement with agents or consultants: watch out for large and unsubstantiated advances
 - > invoices, which should give a detailed description of the services provided
 - > the level of fees, which should be in line with the going rate for similar services.

- Always record and obtain a receipt for all legitimate payments.
- Do not hire a consultant, agent or other third party to work for or with Sodexo if Sodexo knows or if you have reason to believe that the agent is likely to make an improper payment while working on Sodexo's behalf.
- Comply with anti-corruption/bribery legislation and conventions – such as Sapin II law, the 1997 OECD Convention and the US Foreign Corrupt Practices Act (FCPA) the UK Anti-Bribery Act – in every country where Sodexo does business, and require that contractors do the same.

Something to think about:

- When seeking approval, put it in context: mention the amount of any gifts or entertainment you have given to or received from the same person or private business in the past year.



Consider whether the proposed gift or entertainment, even if below the approved limits, would be appropriate under all the facts and circumstances. When in doubt, do not give or receive the gift. The appearance of impropriety is as important as doing something against the policy.

- Never give or receive cash or cash equivalents.
- While a bid or tender process is underway, do not offer or receive gifts or entertainment with the relevant client or supplier.
- When there is an agent that will be interacting with third parties on behalf of Sodexo, before the agent is hired, Sodexo should perform a further investigation into the agent's credentials in order to satisfy its concerns about any "red flags" that have been discovered. A written contract that contains anti-corruption provisions should be signed, and the responsible Sodexo individual should conduct an up-front discussion with the agent on the meaning of our policy and the need to comply with it. In all such cases, check with your supervisor.



PRACTICAL ILLUSTRATIONS:

You are the district manager for facilities management services for a small, poorly funded city school district that is currently re-bidding the services. At the request of the school superintendent, you are asked to host a birthday party for the city's mayor. Should you agree to plan and pay for the party?

No. Hosting a birthday party for the mayor (a local government official) would be against Sodexo's Policy and could be considered a bribe, since it might be seen as paying for the party in exchange for the contract renewal. Additionally, in some jurisdictions this could be seen as a political donation and will need reporting.

You are trying to convince a local government administrator who oversees a benefits program for public employees to switch to an electronic "smart card" program. Even after you explain the benefits of such a program, he remains unconvinced and asks that he and members of his staff be allowed to use these cards for a period of 30 days for free. They ask Sodexo to put some money on the card for them to test. Should you permit him to test these cards?

No, that would be providing something of value to the public officials that could be seen as a bribe. It might be possible to arrange for a test of the cards without using any Sodexo funds, provided any public procurement laws are followed.

Sodexo has a very profitable opportunity to provide camp management services for a copper mine, if the mining operation expands sufficiently. Before the mine can expand, however, it must obtain an environmental impact statement from the local government. You are approached by a local consultant who claims that he "knows how to get things done in the region" and can get the requirement waived. Should he be hired?

It depends. The circumstances surrounding the local consultant's proposal are suspicious and should raise red flags. The statement that he "knows how to get things done" is a red flag since it strongly suggests that he might use part of his fee from Sodexo as a bribe to get the requirement waived. You should very thoroughly investigate the consultant's reputation and credentials. Contact the legal team to assist you in the vetting process. If information on him, including his references, indicates that he is a highly regarded professional who approaches such assignments in an honest and ethical manner, the answer may be "yes" (if his services are rendered pursuant to a written contract and properly documented). If, on the other hand, he provides no references, has no staff and just talks about his "connections", or if his references indicate that he does not always follow business integrity practices, then the answer is "no".

A consultant in a new territory for Sodexo has told you that he can guarantee an increase in Sodexo's new contract awards. All you have to do is hire him and pay him a substantial cash fee up front. Should you do it?

No. A request for payments for consulting services in cash is something that is against Sodexo's policy. Moreover, a "guarantee" is a red flag, since it suggests a relationship with the decision-making officials that is likely to be improper. A request for a substantial fee up front is also a red flag, since it could mean that the consultant wants to use part of Sodexo's fee to bribe the decision makers. And finally, the country where the consultant works needs to be analyzed to determine if it has a reputation for corruption. However, there are circumstances where it is appropriate to hire a consultant to provide Sodexo with local contacts. The contract with the consultant must be carefully reviewed and must contain provisions designed to ensure that the consultant will abide by Sodexo's policy and ethical standards. Consultants used to obtain business must also be subject to a due diligence background check in advance in order to ensure that we are not dealing with anyone with a history of corruption.





FAIR AND OPEN COMPETITION

WE WILL COMPETE FAIRLY, OPENLY, AND LEGALLY

The free enterprise system around the world is based on fair and legal competition. As a global leader, Sodexo will seek to operate and grow our business profitably through intelligence, innovation, hard work and continuously seeking to improve the quality of life of our clients, customers and employees.

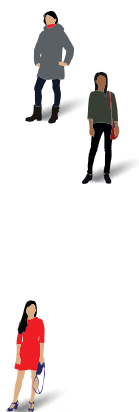
We will make selection and purchasing decisions objectively, based on price, delivery, quality and other factors, and we expect that our clients and suppliers will do the same.

We will determine our own pricing and financial deals independently and will not make agreements with competitors to divide markets or clients.

We will comply with anti-trust laws, which prohibit competitors from agreeing to fix prices, rig bids or to allocate markets, geographies or clients.

We will not misrepresent our competitors' businesses or acquire or seek to acquire a competitor's trade secrets or confidential information through theft or fraudulent means.

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What you can expect:

- Sodexo wins business by delivering services efficiently, reliably and at prices that bring value to our clients.
- Sodexo seeks to identify suppliers that conduct business with ethical standards consistent with our own.
- Sodexo competes and negotiates fairly and ethically for all business opportunities.
- Sodexo will be open and transparent with customers about our relevant partnering arrangements.
- When contracts are awarded to Sodexo, we will do all we can fulfill all contract specifications and comply with applicable terms and conditions.

What is expected of you:

- Always compete on the merits of the Sodexo brand and avoid unfairly disparaging a competitor, misrepresenting any aspect of Sodexo's products or services, acquiring (or accepting) intelligence regarding Sodexo's competitors through theft, industrial espionage, electronic eavesdropping or bribery, or using competitor information that you have reason to believe may not have been properly obtained.
- Never talk to a competitor about prices or terms, dividing markets or geographies, allocating clients or bids.
- Always be careful at trade association meetings.



PRACTICAL ILLUSTRATIONS:

You are a manager for Sodexo's Benefits & Rewards Services business, and your team has been considering the launch, in a new territory, of a new smartcard product for the country's social services administration. During drinks with an executive of a competitor, she mentions that her company is considering marketing a similar product to the government, as well as to a number of local large hospitals. She then suggests that maybe you could both benefit if her company did not market their product to the government, on the condition that in the future Sodexo agrees not to market smartcard products to the hospitals. That way, she suggests, both companies could be successful in this market. What do you do?

Dividing clients or markets (or even discussing the topic) with competitors is against Sodexo's policy and is a violation of many laws. Sodexo welcomes competition on the merits of our services. Her proposal is unethical and illegal, and just bad business. This is a clear issue: you should politely end the discussion by saying that Sodexo is not interested and does not conduct business this way.

A representative from a food services company calls you and suggests meeting to talk about how to divide clients in an EU country for a service that both his company and Sodexo provide. He suggests that it may be a problem if you meet in the EU country, so he wants to meet outside of the EU. Should you go?

No. We do not share or divide markets or clients with our competitors – it is wrong and illegal – and you should never talk to a competitor about dividing or sharing markets. It doesn't matter that the meeting is outside the EU country. Our principles apply everywhere in the world. It doesn't matter where the meeting is held.

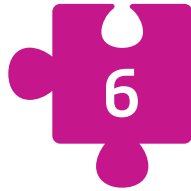
You are a salesperson in a pre-bid meeting with a prospective hospital client that is looking to outsource integrated facilities management services, and you know that the hospital is concerned about contagious diseases. You recently read an article about an e-coli outbreak at an account operated by one of Sodexo's competitors – but you know that the competitor had nothing to do with the outbreak. Should you mention the outbreak in trying to win the business?

No. Since you know the competitor had nothing to do with the outbreak, you'd be misleading the prospect and unfairly disparaging the competitor if you mentioned it. That's not the way Sodexo wins business.

A competitor calls to talk about joining forces for a joint bid and agreeing not to bid the client on an individual company basis. Can we do this?

Generally, that is illegal. There are some limited, special circumstances in which it may be possible, but you will need to review the specific situation with the legal team and your supervisor.





ETHICAL DECISION-MAKING, EVERY TIME

WE WILL MAKE BUSINESS DECISIONS FREE
FROM CONFLICTS OF INTEREST

All business decisions must be made objectively, based upon what is best for the business, not on the basis of any individual employee's personal benefit or advantage. This means that Sodexo employees must recognize when they or somebody else may have an actual or potential conflict of interest and take steps to address it.

When an employee is in a position to influence a Sodexo decision that may result in a personal gain for the employee, a relative or a close acquaintance, the employee faces a conflict of interest. The employee must disclose the situation, which may require steps to eliminate the employee's influence on the decision. Therefore, management employees should not work for competitors of Sodexo. Nor should employees create or seek to operate businesses to supply, partner with, or provide services to Sodexo while working for Sodexo.

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What you can expect:

- Sodexo will make decisions objectively and for the benefit of the business.
- Sodexo will provide employees with training and guidance regarding what constitutes a conflict of interest.



What is expected of you:

- Always advise your supervisor of any conflicts of interest, including any relevant outside business relationships or investments, and those of your close relatives.
- Never make business decisions based on your personal interests.
- Always consider how your personal interests would look to your co-workers and Sodexo's stakeholders.
- Always follow Sodexo standards for outside business relationships.
- Obtain approval before entering into any outside business relationship with an existing or prospective, supplier or client.
- Do not provide skills or services to competitors or help create or assist entities that compete with Sodexo.
- Do not accept employment with or provide outside services to an organization whose relationship with Sodexo he or she is responsible for supervising, directly or indirectly.
- Never have responsibility for Sodexo's business with a close relative, or employ a close relative in a supervisory-subordinate relationship.
- Never invest in a competitor, or any company if you are responsible for Sodexo's dealings with that company.
- Never accept inappropriate gifts or entertainment.

PRACTICAL ILLUSTRATIONS:

You need additional catering assistance for a Sodexo project. Your sister has catering experience, is available on short notice, is very competent and will be paid a standard rate, and no one would know you are related as she is married and has a different last name. Can you hire your sister?

No. Employees should not employ close relatives in direct supervisory subordinate relationships (or supervise them as outside consultants) regardless of whether these relationships are known or readily apparent. If you believe your sister is the most qualified candidate, you should discuss the matter with your supervisor. In certain circumstances, if another Sodexo manager supervises the event, or makes the decision to hire your sister, and the relationship is clearly announced, it may be possible.

You are a food service manager at a university cafeteria. You are considering becoming half-owner of a restaurant which is near the university and is frequented by university students. Can you make the investment?

No. The restaurant is a competitor of the university cafeteria and you should never invest in a competitor. A conflict of interest could arise, for instance if you were tempted to overlook bad service in the cafeteria that led to more students eating at your restaurant.

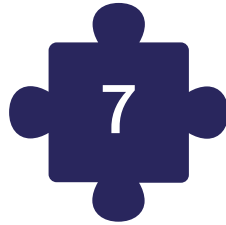
Your brother-in-law recently bought a dairy that supplies milk and butter to the retirement center serviced by Sodexo in which you are a manager in the finance department. Although you do not make the purchasing decisions directly, in monitoring the center's expenditures you would have some influence on those decisions. Should you disclose this to your supervisor?

Yes. Your brother-in-law's ownership of the dairy should be disclosed to your manager. You should never be responsible for Sodexo's business dealings with any of your close relatives. Even though you do not directly make purchasing decisions, your responsibility for monitoring expenditures could give rise to conflicting pressures. For instance, you could be tempted to overlook payments to the dairy that are above what you believe other suppliers might charge. If your brother-in-law is the best qualified supplier, then another Sodexo employee should be responsible for reviewing the payments to him.

As a regional manager, you have been asked to select local affiliates for one of Sodexo's Benefits & Rewards Services programs. You have a 25% investment in one of the potential affiliate businesses, a provider of dry cleaning services.

When selecting suppliers or affiliates you must ensure you are basing your decisions strictly on business considerations and not on any personal interests. Sodexo might want to affiliate itself with a limited number of dry cleaning providers in the area, in which case your company will be competing with others. Even if Sodexo was to offer affiliation to every local dry-cleaning provider in the area, it still would need to bargain at arms-length with the companies over contract terms. For these reasons, your ownership stake in the dry cleaners poses a clear conflict of interest, and you must alert your supervisor of the conflict and remove yourself not only from the process of evaluating and negotiating with your company, but also from the process of evaluating and negotiating with all affiliates (here, dry cleaning providers).





USE AND PROTECT SODEXO'S ASSETS

**OUR EMPLOYEES WILL USE AND PROTECT SODEXO'S
ASSETS INCLUDING PROPRIETARY INFORMATION
AND OTHER INTANGIBLE PROPERTY- FOR THE BENEFIT OF
SODEXO, AND SHALL NOT USE SODEXO PROPERTY
OR INSIDER INFORMATION FOR PERSONAL GAIN**

Sodexo employees must work professionally and in good faith to advance Sodexo's business interests. They must employ Sodexo assets, including proprietary business information and other intangible assets, properly and in accordance with management authorization, and may not misuse or waste Sodexo assets. All employees have a duty to protect confidential information about Sodexo, its clients, suppliers and employees, even after they leave Sodexo. Likewise, they must not use Sodexo's property or information for their personal gain, or that of their relatives, friends or acquaintances.

Employees may not use insider information such as non-public information about financial results, mergers or acquisitions, large contract awards or strategic plans to trade securities of Sodexo or pass it along to third parties for that purpose.

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What you can expect:

- Sodexo forbids the use of insider information for insider trading. It is illegal and Sodexo will prosecute anyone found doing it.
- Sodexo will protect confidential information and that of our clients, suppliers and partners.
- Sodexo will provide employees with training and guidance regarding what constitutes insider trading, as well as how to protect confidential information and other company assets.

**What is expected of you:**

- Never use confidential or “insider” information obtained through your employment for personal gain.
- Never buy or sell securities on the basis of insider information or disclose insider information to anyone outside Sodexo, including family members.
- Never buy or sell securities of a company (including Sodexo) if you have insider information about that company.
- Always follow Sodexo’s rules for safeguarding confidential information.
- Only share confidential information (but not non-public financial information) with other organizations when there is an approved confidentiality agreement or non-disclosure agreement in place.
- Always protect confidential information entrusted to us by others as carefully as you protect Sodexo information.
- Never use any Sodexo technology, communications, equipment or facilities for personal purposes without your manager’s approval.
- Never use a client’s property for your own purposes.
- Never spend Sodexo’s money or incur commitments other than for Sodexo’s legitimate business purposes.
- Always protect Sodexo’s intangible property, including trade secrets and company time.
- Always use your time in the workplace for Sodexo business and not unreasonably for personal activities.
- Never take for yourself any business opportunity that you discover through your job.
- Never compromise Sodexo’s intellectual property or brand by disclosing confidential information, including research and development and strategy, costs, prices, sales, profits, markets, customers, and methods of doing business.

PRACTICAL ILLUSTRATIONS:

You are a Sodexo employee working at a university integrated facilities management services operation and you would like to borrow a lawn tractor one weekend to do a favor for an elderly neighbor whose yard has grown out of control. Since the university is closed, the lawn tractor will not be missed and the client will never know you borrowed it. Is this acceptable?

No. While using the lawn tractor may not negatively impact the operations at the university, it results in additional wear and tear and raises issues of liability and insurance. Sodexo employees may not use a client’s property for their own purposes.

You recognize that creating alliances with other organizations is important to Sodexo’s growth and development. In order to further strengthen the relationship with one organization, you invite the president of that organization to join your area meeting. At this meeting, you would normally discuss your business unit’s non-public year to-date financial results. Can you discuss these in front of the visiting president?

No. Non-public financial information should not be shared with anyone outside of Sodexo, even those with whom we have created special relationships. Remember that confidential information should not be shared even within Sodexo with those who do not have a need to know.

At a family gathering, your uncle tells you that he is considering buying stock in a regional agricultural conglomerate. You know that Sodexo has been dissatisfied with the service of that company and will almost certainly terminate the contract when it expires in a few months. Can you tell your uncle this?

No. Although it may be difficult, you may not advise your uncle on the basis of confidential, insider information. You should not comment on the investment and, if he asks for advice, you should tell him that the agricultural firm does business with Sodexo and that it would not be appropriate to comment under our principles of business integrity.



FINANCIAL DATA YOU CAN RELY ON

**WE WILL MAINTAIN ACCURATE AND RELIABLE
BUSINESS RECORDS AND PROVIDE TRUE AND FAIR
FINANCIAL STATEMENTS**

All employees must keep accurate and proper books and accounting and other records that give a true and fair view of the financial position, results of operations, transactions, assets and liabilities of Sodexo. All business records must be maintained in accordance with Sodexo's own internal controls and accounting procedures. Employees shall not make false or artificial entries in Sodexo's books and records for any reason at any time.

Sodexo will comply with applicable anti-money laundering laws and take appropriate measures to prevent and detect the concealment of illegal funds.

Sodexo employees must never do anything that compromises the integrity of the Group's financial statements, or coerce, manipulate or mislead outside or internal auditors with respect to the Group's books and records.

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What you can expect:

- Sodexo will report and record financial information accurately, honestly and transparently.
- Sodexo has controls to ensure all financial records are correct and meet the commercial, legal and regulatory requirements.
- Sodexo will provide training and guidance to employees responsible for keeping and recording financial records.

What is expected of you:

- Always record transactions accurately and maintain financial records in accordance with Sodexo policies and relevant accounting standards.
- Always tell a manager If you are uncertain about the accuracy of any entry or financial process or if you believe you are being asked to create a false or misleading entry, data or report.
- Never encourage or coerce others to violate or compromise the integrity of Sodexo's records.
- Never deliberately make a false or misleading entry in any report, record or expense claim, whether financial or non-financial.
- Always ensure that transactions are properly authorized and documented.
- Never make any payment (or dispose of Sodexo's assets) for any purpose other than the purpose recorded in Sodexo's books and records.
- Always be certain, to the extent that you are responsible, that proper internal controls are in place to ensure that internal and external reporting complies with Sodexo's standards.
- Always cooperate with internal and outside auditors.

PRACTICAL ILLUSTRATIONS:

You are the unit manager of an integrated facilities management account. The client's representative comes to you and says his expenses are under budget for his fiscal year, which is ending next month. To make sure his budget is in line with his forecast, he asks you to book some expenses to his budget temporarily, which can then be reversed the following accounting period in the next fiscal year. Since it is only temporary and would be appreciated by the client, is it okay to do this?

No. You should never make a false entry in any record – even if it is temporary. Just as you would not mis-state Sodexo's financial records, you should never help a client mis-state their financial results.

These same standards apply to non-financial data, like quality, safety and personnel records. You should always have a reasonable basis for entries you make in Sodexo records, and you should never make a false or misleading entry in non-financial records, just as you would not make such an entry in a financial record.

Always ensure that transactions are properly authorized and documented.

Sodexo has implemented a system of internal controls designed to ensure that transactions and access to assets are properly authorized, that transactions are recorded in accordance with accounting and financial policies, that there is accountability for assets, and that recorded assets are compared to existing assets at reasonable intervals. You must never try to circumvent Sodexo's internal controls – to do so is a violation of the policy and there are serious legal consequences.

Never make any payment (or dispose of Sodexo's assets) for any purpose other than the purpose recorded in Sodexo's books and records.

You must never make a payment that is not properly authorized and documented. This also means never making a payment for a purpose different from the one authorized or recorded.

Always be certain, to the extent that you are responsible, that proper internal controls are in place to ensure that internal and external reporting complies with Sodexo's standards.

You are responsible for the financial reporting for your business unit. A relocation expense occurs in the current period. You were unaware of this expense and so this expense was not in your previous forecasts. Since the expense is a one-time expense and relatively minimal you are asked to defer it to the next period. What do you do?

Deferring the relocation expense is unethical and a violation of the policy. Accounting standards require that your reporting be accurate and timely. It makes no difference that this deferral may be a one-time event. All expenses must be recognized in the period they occurred.

Those responsible for the accuracy of financial reporting have a special responsibility to be certain that proper internal controls are in place to ensure that internal and external reporting complies with the policy. That is why Sodexo has adopted the Code of Conduct for Senior Managers.

Always cooperate with internal and outside auditors.

You were recently promoted to district manager. As a district manager, you have frequent business trips and related business expenses. However, before you can be assigned an account number for your expenses, you are asked to go on a trip for one of your new accounts. One of the units for which you now have responsibility is making money and is ahead of budget, so you decide to charge the expenses to this account. Can you do this?

Since any inaccurate or incorrect reporting affects Sodexo's financial statements and any intentional financial mis-statement is wrong, booking your expense this way is unethical.





WE TREAT OUR EMPLOYEES FAIRLY AND RESPECTFULLY

**WE WILL TREAT ALL EMPLOYEES
FAIRLY AND RESPECTFULLY AND PROVIDE A SAFE
WORKPLACE FREE OF HARASSMENT AND DISCRIMINATION**

Consistent with our Statement of Respect for Human Rights, our commitment to Business Integrity includes treating our employees with honesty, fairness, respect and dignity.

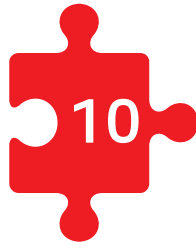
Sodexo will provide a safe and healthy workplace. Working conditions must comply with applicable laws and regulations at a minimum and will be subject to Sodexo's workplace health and safety program.

We expect all employees to treat each other with decency and respect. We will not permit violence in the workplace or any verbal, emotional, psychological, sexual, physical, or any other form of harassment, abuse, intimidation, or bullying. We prohibit discrimination against employees in hiring, promotion, salary, performance evaluation or any other term or condition of work, on the basis of race, color, national origin, gender, gender identity, sexual orientation, religion or disability, or any other basis that is prohibited by applicable laws and regulations. We will not permit the use of indentured, slave, bonded or other forced involuntary labor. Nobody under the age of 15, or the legal age of employment in any country or local jurisdiction, whichever is higher, may be permitted to work for Sodexo. We will not employ minors to perform. and no minor may be employed to perform hazardous work, and any employment of minors is subject to legal limitations regarding hours of work, wages, working conditions and minimum education.

We respect the rights of our employees to decide whether or not to be represented by a trade union and to bargain collectively. We will not discriminate or retaliate against any employee or employee representative because of affiliation with, support for, or opposition to any union.

We will pay employees lawful wages and benefits on a timely scheduled basis for all time that they have worked. Our teams will observe all applicable laws and regulations for working hours for employees, including maximum hour limitations and requirements for break times. Overtime may be required only as permitted by law based upon the nature of the work.





WE RESPECT AND PROTECT PRIVACY

WE WILL RESPECT AND PROTECT THE PRIVACY AND CONFIDENTIAL INFORMATION OF OUR STAKEHOLDERS

Sodexo is committed to respecting the confidentiality of personal information of all its stakeholders, including employees, clients, beneficiaries, consumers and business partners. We will maintain policies and processes intended to ensure compliance with all relevant privacy and data protection laws.

We protect the privacy and confidentiality of our job applicants, employees, clients, consumers, business contacts, shareholders and any other third parties' personal information by not disclosing such information to anyone, internally or externally, other than those with a business need for such information and where we are legally permitted to do so.



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What you can expect:

- Sodexo complies with the Sodexo Data Protection Corporate Rules, Policies, Procedures and Codes of practice, set out in accordance with the European Legal Data Protection Framework, any applicable privacy, data protection and data security laws and the Sodexo Group Information & Security Policy; and We monitor the compliance with the above.
- Sodexo ensures lawfulness, fairness and transparency.
- Sodexo processes personal data for a known, relevant and legally grounded purpose only.
- Sodexo ensures that any personal data we process is adequate, relevant and limited to what is necessary for the purposes for which it is originally collected and processed.
- To facilitate transfers of data within the Group, Sodexo has a set of "Binding Corporate Rules," which governs data transfers from a European subsidiary to another Group subsidiary.
- Sodexo keeps personal data that is processed accurately and, where necessary, up to date.
- Sodexo keeps personal data only for as long as necessary.
- Sodexo ensures that any sub-contractor, internal or external, acting on our behalf adopts» and delete «of any Sodexo entity adopt appropriate technical and organizational security measures.
- Sodexo reports any personal data breach to the relevant supervisory authority(ies) and/or the affected individuals.
- Sodexo processes sensitive personal data only if it is strictly necessary to achieve the purpose of the processing and if there is a legal ground to do so.
- Sodexo keeps data processing records of its processing activities.
- Sodexo is receptive to any requests made by data subjects about their Personal data.
- Sodexo does not conduct any evaluation or take any decision about individuals, which may significantly affect them, based solely on automated processing of their personal data, unless in certain limited cases and with suitable safeguards implemented.
- Sodexo provides individuals with comprehensive information notices and data protection policies as appropriate prior to collection and processing of their personal data in compliance with the European Legal Data Protection Framework and any other applicable local data protection law.
- Sodexo does not transfer personal data to third parties outside the EU/EEA without ensuring adequate protection for the personal data transfer



- Sodexo embraces privacy by design for every new digital project or new business opportunity involving personal data processing in accordance with the Global Data Protection Impact Assessment procedure and privacy by default by training its personnel handling personal data and implementing procedures. We train all employees responsible for handling personal data is processed, appropriate technical and organizational measures are put in place.
- Sodexo conducts Data Protection Impact Assessments where required.
- Sodexo provides appropriate training to employees who have permanent or regular access to personal data, who are involved in the collection of personal data or in the development of tools used to process personal data.

What is expected of you:

- Make sure the people from whom we collect personal data are informed of the type of information we are collecting, how we plan to use it, and how they can contact us if they have any questions.
- Collect only the personal data that is necessary. This data must be used fairly and for a specific, clear and legitimate purpose, and must only be retained for as long as is necessary for the purpose for which it is processed. You must not collect “sensitive” information (related specially to state of health, ethnic origin, sexual orientation, political opinions, religion) without the consent of the person concerned or only if the law requires it.
- Destroy or correct any inaccurate or incomplete data.
- Make sure such data is securely stored.
- Ensure we only provide such data to authorized people, on a strict “need-to-know” basis.
- Ensure that the third parties to whom we could delegate the collection or use of personal data comply with these principles.

PRACTICAL ILLUSTRATIONS:

You are working in the HR department and your colleague from the marketing team has asked for access to the HR database. Should you give him access to?

No: unless the access can be justified by a need to know.

You would like to receive a weekly newsletter to be informed about the new recipes in your favorite French cooking app. In addition to your email address, you’re asked to provide your date of birth and dietary preferences. Should the app company be compliant to the principles of data protection?

Yes. The company is asking for your email address and other information which are all considered personal data so it must comply with the applicable data protection laws. However, the collection of the date of birth and the dietary preferences is not necessary to send you a weekly e-newsletter.

You are sharing personal data with an IT provider but you do not know if the provider implements appropriate security and confidentiality measures to protect data. Should you put in place a written agreement between the parties?

Yes, in order to ensure that your third-party providers comply with the personal data regulation, a written agreement should be put in place.

Mr Smith wants to launch a new mobile app for fitness tracking in the UK, Germany and Poland. He decides not to inform the UK, German and Polish users about how the data collected will be used because he thinks that nobody is interested in reading the information. Should Mr Smith inform users of how their data will be used?

Yes. Consumers have the right to know what personal information has been collected, how it is going to be used, what their rights are and how they can exercise such rights.



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