

SODEXO GROUP TAX POLICY

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Sodexo is the global leader in services that improve Quality of Life, an essential factor in individual and organizational performance. Operating in 72 countries, Sodexo serves 100 million consumers each day through its unique combination of On-site Services, Benefits and Rewards Services and Personal and Home Services. Sodexo provides clients an integrated offering developed over more than 50 years of experience and its success and performance are founded on its independence, its sustainable business model and its ability to continuously develop and engage its 460,000 employees throughout the world.

SODEXO GROUP TAX POLICY

Sodexo has a common approach as to the way it handles tax issues in all the countries in which it operates thanks to a global tax function.

The Group Tax Policy has been designed to meet this goal of tax consistency worldwide and to ensure that we pay the appropriate taxes in line with the local tax rules and the conduct of our business in the various geographies in which we operate. Sodexo's core values guide how we do business, support economic growth and enhance social development for local communities.

Our tax positions are based on reasonable interpretation of applicable law and are aligned with the substance of the economic activity of our business locally.

Sodexo may decide to choose the most tax-efficient structure, sometimes with the use of tax incentives and/or exemptions intentionally offered by local tax systems, that delivers the overarching business goal and that is always compliant with applicable tax laws. Whatever position it opts for must be solidly argued and substantiated in line with business rationale.

Sodexo is not using intended tax structures for tax avoidance nor investing in tax structures located in so-called "tax havens" in order to avoid taxes.

Attitude towards tax planning & risk level acceptance

We have a low tolerance for tax risk and reject tax opportunities which are not in line with our [Principles of Business Integrity](#) and [Code of Ethics](#). As such, Sodexo does not support and is not engaged in aggressive tax planning or artificial tax avoidance. We expect our partners to observe the same high standards of ethics.

Sodexo will always:

- Perform risk management assessments before adopting a tax position;
- Ensure that each controlled entity has a sound commercial, business or financial justification and has the sufficient level of substance;
- Frame transfer pricing policy for intra-Group exchanges of goods and services on an arm's length basis, pricing in line with international standards (e.g. OECD Guidelines); this principle is applied consistently across the Group and adequately documented;
- Monitor tax compliance in jurisdictions where Sodexo operates.

All significant tax positions are regularly reported by the Group VP Tax to the Group Audit Committee.