

CALIFORNIA DISCRIMINATION, HARASSMENT, AND RETALIATION POLICY

Equal Employment Opportunity

Sodexo is committed to offering equal employment opportunities without regard to actual or perceived race, color, religion, sex, pregnancy, national origin, ancestry, citizenship, age, marital status, disability, military/veteran status, civil air patrol membership, sexual orientation, gender identity, gender expression, genetic information, medical condition, HIV/AIDS status, natural hairstyles/textures, political affiliations/activities, Medi-Cal status, status as a victim of domestic violence or stalking, or any other basis protected by law. This commitment extends to all aspects of employment, including but not limited to: advertising or solicitation, recruiting, hiring, placement, promotion, accommodation, transfer, demotion, compensation, training, layoff or termination, participation in social and recreational functions and use of employee facilities.

Any employee who in any way discriminates against a fellow employee, a customer, or any other person will be subject to constructive counseling, up to and including termination of employment.

Sodexo will not discharge or in any other manner discriminate against employees or applicants for any of the protected bases identified above or because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. Furthermore, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with Sodexo's legal duty to furnish (or allow the disclosure of) such information.

Retaliation Prohibited

Sodexo will not retaliate against an individual because he or she opposes any practice that he or she reasonably believes to be unlawful, files or participates in an investigation of an internal claim or a formal charge of discrimination, requests a reasonable accommodation, or participates in any action under any anti-discrimination law. Engaging in retaliation will result in constructive counseling, up to and including termination of employment.

If you believe that you have been discriminated against, harassed, or subjected to retaliation, you should promptly inform Sodexo in any of the following ways:

- Follow the procedures described in the Promise of Respect and Fair Treatment.
- Notify your manager.

- Notify your manager's manager.
- Notify a Sodexo Human Resources representative.

Harassment Prohibited

Sodexo is committed to providing and maintaining a workplace that is free of harassment of any kind. Harassment is offensive, unwelcome, physical, or verbal behavior due to any of the protected characteristic listed above or any other basis protected by law. Harassment can be verbal (such as slurs, jokes, insults, epithets, gestures or teasing), graphic (such as offensive posters, symbols, cartoons, drawings, computer displays or emails) or physical conduct (such as physically threatening another person, blocking someone's way, etc.). We prohibit any conduct that contributes to an intimidating or offensive work environment and/or interferes with a person's ability to perform his or her job. Such conduct violates this policy, even if it is not unlawful. Because it is difficult to define unlawful harassment, individuals are always expected to behave in a professional and respectful manner.

Do not assume that behavior that is not offensive to you is acceptable to others; harassment is often defined by the person receiving it. Harassment may involve, but is not limited to co-workers, supervisors, subordinates, customers, clients, and third parties (e.g., employees of clients and vendors).

Sodexo's policy against harassment also covers off-duty interactions between employees and the above persons either in person, by telephone, through electronic communications (such as email or texting), or through social media and/or at after-hours events such as, but not limited to, business meetings, happy hours, dinners, trainings, and during work-related travel.

Sexual Harassment Prohibited

While it is not possible to list all the circumstances that can be considered sexual harassment, the following are some examples that, if unwelcome, may contribute to a claim of sexual harassment depending on all circumstances, including the severity and frequency of the conduct:

- Sexual advances, whether or not they involve touching.
- Any type of sexual activity in the workplace (even if it is consensual), including exposure.
- Requests for sexual favors in exchange for actual or promised job benefits, such as favorable performance reviews, salary increases, promotions, increased benefits, or continued employment.

- Any threat to an employee that refusal to submit to sexual advances would adversely affect his or her employment, performance review, wages, advancement, assigned duties, shifts, or any other term or condition of employment.
- Sexual jokes.
- Use of sexual epithets, written or verbal references to sexual conduct, gossip regarding one's sex life, comments on an individual's body, or comments about an individual's sexual activity, deficiencies, prowess, or sexual orientation.
- Displaying, or transmitting electronically, sexually suggestive objects, pictures, or cartoons.
- Leering, whistling, brushing against the body, patting, standing too close, sexual gestures, suggestive or insulting comments.
- Inquiries into one's sexual experiences.
- Discussion of one's own sexual activities.
- Assault or coerced sexual acts.
- Use of slang nicknames such as "honey," "sweetie," "babe," "boy," "girl," or "doll."

Inappropriate conduct may be sexual harassment even if the individual did not intend to harass. In addition, sexual harassment can be committed by either males or females and can be directed against persons of the opposite or same gender.

Other Forms of Harassment Prohibited

There are other forms of harassment that are also prohibited, including:

- Telling racial, ethnic, religious, or off-color jokes or slurs, or using any other communication or conduct that is negative or degrading to any employee, client, customer, or vendor.
- Talking about co-workers, clients, customers, or vendors using racial, ethnic, religious, or other unprofessional terms.
- Making insulting, degrading, threatening or otherwise offensive or hostile

comments, graffiti, posters, writings, gestures, or actions.

- Starting or perpetuating rumors, false statements, or gossip.
- Displaying, wearing, or transmitting inappropriate images, messages or communications, including through voicemail, email, text messages, instant messaging systems, or any form of social media containing ethnic, racial or religious slurs, sexual content, or anything that may be construed as harassment or disparagement of others.
- Anything else that reasonably could be thought by another employee, client, customer, or vendor as causing or contributing to an intimidating, uncomfortable, humiliating, hostile or offensive workplace.

Any employee who engages in harassment will be subject to constructive counseling, up to and including termination of employment.

Harassment Training

Sodexo provides classroom or other effective interactive training regarding sexual harassment (including without limitation abusive conduct) in compliance with California law. This training lasts (1) at least two hours for supervisory employees and (2) at least one hour for nonsupervisory employees. It is provided within six months of the employee's hire or promotion date as well as once every two years.

Seasonal and temporary employees (or any employee who is hired to work for under six months) will receive this training within 30 calendar days after their hire date or within 100 hours worked, whichever occurs first.

Reporting Harassment

Any victim of or witness to potential harassment is urged to notify Sodexo of the offending conduct immediately. If you believe that you, or another employee, have been subjected to harassment, whether by a manager, supervisor, client, co-worker, customer, vendor, or any other person in the work environment, you should promptly inform Sodexo in any of the following ways:

- Follow the procedures described in the Promise of Respect and Fair Treatment.
- Notify your manager.
- Notify your manager's manager.

- Notify a Sodexo Human Resources representative.

All complaints will be taken seriously. Any manager who receives a complaint of, or has knowledge of, harassing behavior must immediately report it to the PeopleCenter even if the individual does not wish to make a formal complaint. Failure to do so may result in constructive counseling, up to and including termination of employment.

Reports of harassment will be investigated thoroughly and promptly. Employees must cooperate and be truthful if they are contacted by a Human Resources or management representative relating to a harassment investigation.

As further described below, when a complaint is brought under this policy, Sodexo's complaint process ensures such complaints receive:

- Sodexo's designation of confidentiality to the extent possible.
- A timely response.
- An impartial and timely investigation by qualified personnel.
- Documentation and tracking for reasonable progress.
- Appropriate options for remedial actions and resolutions.
- Timely closure.

Upon receipt of allegations of potential misconduct related to this policy, Sodexo will conduct a fair, timely, impartial, and thorough investigation, commensurate with the circumstances. The investigation will provide all parties appropriate due process and reach reasonable conclusions based on the evidence collected. Sodexo will document and track the progress of its investigation and issue a timely response and closure communication.

Furthermore, to the extent possible, Sodexo will endeavor to keep the reporting of employee's concerns and the investigation confidential. However, certain information may have to be disclosed for an effective investigation to be conducted. All individuals are expected to fully cooperate with Sodexo-initiated investigations. This includes, but is not limited to, maintaining an appropriate level of discretion regarding the investigation, and disclosing all information that may be pertinent to the investigation. If, after investigation, Sodexo determines that harassment has occurred, it will take immediate action to address that conduct and attempt to make sure it does not occur again.

Retaliation against victims of and/or witnesses to harassment, or against anyone who cooperates in an investigation of harassment, is prohibited. Reporters of harassment may not be blamed for "causing problems." Engaging in relation will result in constructive counseling, up to and including termination of employment.

Employees who believe that they have been discriminated or retaliated against or harassed may also file a complaint with the local office of the California Department of Fair Employment and Housing (“DFEH”) or the U.S. Equal Employment Opportunity Commission (“EEOC”). The EEOC and the DFEH have authority to remedy violations and can award limited monetary damages and fines. The address and phone number of the local EEOC office can be found at www.eeoc.gov. The address and phone number of the local DFEH office can be found in the State Government section of your local phone directory or at www.dfeh.ca.gov.

Acknowledgment

By signing below, I acknowledge that I have received a copy of Sodexo’s California Discrimination, Harassment, and Retaliation Policy, reviewed that policy in its entirety, and understand its contents.

Signature

Date: _____

Printed Name