



# HUMAN RIGHTS AND MODERN SLAVERY REPORT 2021

Centerplate Europe

## Tackling modern slavery

Centerplate is a people business. Every day our 36 permanent employees - and up to 1,000 casual staff - across the UK deliver bespoke hospitality experiences at leisure venues and events. Since 2017 Centerplate has been part of Sodexo, a global leader in services, with 31,000 employees in the UK and Ireland.

Our relationships and responsibilities do not stop at our borders. We are part of Sodexo's global business with a significant supply chain connecting us with over six thousand additional businesses.

I am proud to be part of a company that shares the same principles as those set out in the Modern Slavery Act of 2015. 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 is a signatory to the UN Global Compact and respects 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.

The risks faced by survivors of Modern Slavery – which are a serious concern at any time – are compounded by the Covid-19 public health crisis. It is therefore even more critical at this time to ensure that our policies and practices are in place to ensure that employees and those of our supply chain partners are protected and not taken advantage of at this challenging time.

As you will see in this Statement, Centerplate and Sodexo are showing our commitment to the cause through a range of actions consistent with our position as a world leader in its respect for human rights both within our business, supply chain and beyond.

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

We must all play our part in upholding human rights and combatting modern slavery. This is why we must be vocal in our commitment to safeguarding the highest standards of ethical conduct across our business and beyond.

A handwritten signature in black ink, appearing to read "Chris Bray".

Chris Bray

Company Director, Centerplate Europe and CEO, Sports & Leisure, Sodexo UK and Ireland

# Knowing our business

*Making it better to be there since 1929*

At gathering places across North America and the United Kingdom, Centerplate and our partner venues have been defining extraordinary experiences through thoughtful hospitality, expertly delivered, for more than 80 years.

Our strategic approach to hospitality creates tailored food and beverage programs, unique hospitality design, rewarding event and retail services to deliver the type of one-of-a-kind, local authenticity that builds loyalty, reputation, and memories.

We have the distinct privilege to partner with over 300 premier event venues across the United States, Canada and the United Kingdom; annually serving more than 115 million guests.

In 2017 Centerplate was acquired by Sodexo, strengthening Sodexo's position as a global player in the Sports & Leisure industry.

Sodexo Holdings Limited and Sodexo Global Services UK Limited are subsidiaries of the Sodexo Group, and our parent company is Sodexo SA which is headquartered in France. Operating in 64 countries and serving 100 million consumers every day, our global success and performance are founded on our independence, our sustainable business model and our ability to develop and engage our 420,000 employees worldwide.

Here in the UK, Sodexo Sports and Leisure, which includes the Centerplate business, works across nearly 50 contracts in sports stadia, conference centres, cultural and historical destinations, airline lounges and at major events across the UK. We employ a team of over 650 people delivering services including catering, hospitality, sales and marketing, commercial ticketing and venue management.

## Our Supply Chain

Our Supply Management Team has continued to drive the "Tackling Modern Slavery" programme forward in 2020, achieving all our key milestones including, deploying an audit and improvement programme, training our buyers in modern slavery risk and implementing a Strategic Supplier Forum.

To deploy the audit and improvement programme, our teams have utilised the work completed in the two years prior, which created a risk status for our entire supply chain, based on data from the Global Slavery Index and the International Labour. In order to support this process, we have partnered with Verisio, a leader in the field of social auditing in the UK&I.

We have taken a prioritised approach and our first-tier suppliers have been moved into this process. We have completed an audit on our 135 largest and highest risk suppliers and are getting ready to launch the second-tier tranche in early December 2020.

The audit process creates a corrective plan for each supplier and Verisio track the activity completed to ensure companies are attaining a compliant level to eradicate risks of modern slavery in their organisations.

In 2020 it was our ambition to train all Buying teams to understand modern slavery in global and domestic markets and to equip these teams to identify risks in their supply chains and to question

their suppliers more rigorously on this subject. We have achieved far more than our initial ambition as, with our training partner, The Ethical Trading Initiative, we have reached our entire Supply Management team across our UK & Ireland entities from Buyers to Data Teams and Helpdesk. The Ethical Trading Initiative is a global expert organisation on sustainable procurement and the sessions held were very well received. In 2021 we plan to expand the knowledge around modern slavery risk further within our organisation to our operational networks and executive management teams. It is key that we widen the net of our understanding on this subject and put it in the minds of our frontline staff to allow them to see risk in an operational environment.

During 2020, we began conversations with our key strategic suppliers on modern slavery risk and have created a Strategic Supplier Forum which will focus on modern slavery as well as incorporate other areas in our Responsible Sourcing agenda. Meetings are due to be held in the first quarter of 2021.

The progress made in 2020 in Supply Management “Tackling Modern Slavery” in all three areas is in addition to our already extremely robust new supplier assessment tools and processes.

In 2021, we plan to review the progress we have made and look to further our work in tackling modern slavery with a focus on policy, suppliers training and whistleblowing, while continuing the workstreams already in place, described above.

On a global level, Sodexo is working with an expert risk management organisation, Ecovadis, to ensure that we are exceeding global legal requirements in our worldwide supply chains such as Loi Sapin II, Devoir de Vigilance and the California Transparency in Supply Chains Act.

## Our principles, policies and approach

Centerplate and Sodexo UK and Ireland’s policies reflect our commitment to acting ethically and with integrity in all our business relationships. We are implementing and enforcing 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
- UK & Ireland whistle-blower policy
- Supplier Code of Conduct
- Supplier governance and supply management policies

Our policies are made available to all employees via the external website [www.uk.sodexo.com](http://www.uk.sodexo.com) as well as the internal employee intranet. The Fundamental Rights at Work Charter specifically addresses forced labour and is supported by training modules with clear expectations of employees and workers.

## Whistle-blower policy

Sodexo UK and Ireland’s whistle-blower policy was updated in January 2016 to reference the Modern Slavery Act and this now forms the basis of the Centerplate policy.

This policy now includes our commitment to the elimination of compulsory labour, slavery and human trafficking, as well as providing the facility for employees to raise concerns via a confidential channel.

A hardcopy and electronic employee handbook references Sodexo's policies and is provided to all new starters. The employee handbook includes a statement confirming 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 weekly brief. They are required to cascade the updates to all team members who do not have access to the electronic communication channels. This includes Centerplate Sodexo's non office-based employees, who are able to access a range of HR guidance and policies from a dedicated website, accessible from outside of the Sodexo IT network.

Complaints and concerns raised by staff, whether via the whistle-blower portal or otherwise, are managed and monitored by the Ethics & Compliance Committee. This group is chaired by the HR Director and comprises the Regional Chair, Chief Financial Officer, General Counsel, Head of Internal Audit Regional Chair, Corporate Responsibility Director, Head of Internal Control, Head of Supply Management and Segment CEO.

The Committee monitors the status of any matters raised and the actions taken, policies, training and trends. The Committee reports periodically to the Sodexo Limited Board of Directors.

## Supplier Code of Conduct

The Centerplate business would align with Sodexo's 'Code of Practice' documents, which are in place to determine the health, safety, environment and quality standards each supplier must meet prior to engagement with Sodexo. The Sodexo Safety 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, and 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 particular field of expertise, such as via accreditations to relevant bodies or a demonstration of similar activity with existing clients.

Centerplate and Sodexo require 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 reviewed regularly to reflect the changing needs of our business and any fundamental changes to legislation not covered. The current Supplier Code of Conduct was updated and reissued in April 2017 and is available by [clicking here](#).

## Due Diligence

Centerplate manages risks across the company, aligning to Sodexo UK & Ireland risk management protocols, through a combination of policies, procedures, training and committees which monitor incidents and report to the Board of Directors. 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 chains.
2. Mitigate the risk of slavery and human trafficking occurring in our supply chains.
3. Monitor potential risk areas in our supply chains.

#### 4. Protect whistle-blowers.

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 programme. This consists of various elements including:

- A supplier governance team to monitor and govern the contractual relationships Sodexo has with those persons and companies that provide services or supply goods on its behalf. This team works closely with Sodexo's legal department, internal audit and specialist risk experts, to ensure protocols, governance procedures and contractual documents are continuously improved in line with legislative and best practice developments. They also manage effectively any potential risk exposure through the Sodexo supply chain.
- Centerplate and Sodexo use a 'prequalification' process in order 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 has been updated to include questions relating to the Modern Slavery Act 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. Only those suppliers that achieve a pass will be considered, and where a supplier fails initial assessment, a secondary assessment may be undertaken subject to further discussions with Sodexo's purchasing department and internal audit team.

Centerplate and Sodexo use central tracking of certification and documentation validity. As supplier qualifications reach their end date, the governance function is prompted to request new documentation from the supplier.

## Assessment and Management of our suppliers

Centerplate and Sodexo are working to improve their assessment and prioritisation of risks in their supply chain. Centerplate and Sodexo draw upon external resources and engage with external stakeholders to identify areas where risk may be most significant. For example, Sodexo has appointed two quality assurance/corporate social responsibility auditors to work with uniform suppliers in Asia. The textile industry is a potential area of risk, so auditors provide an additional level of assurance to ensure suppliers are following Sodexo's code of conduct.

We have a dedicated supplier compliance team with involvement and support from Senior Management, Internal Audit, HR and Legal. This team has reviewed all of Centerplate and Sodexo's supplier contracts and implemented new provisions to address slavery and human trafficking risk in our supply chain. For all of Sodexo's existing Tier 1 suppliers, this has included implementing updated terms and conditions that will be tracked through the prequalification tool. A copy of these revised terms and conditions is available on request.

Particular provisions to address this area of risk include:

- Categories of suppliers must provide to Centerplate Sodexo a slavery and human trafficking statement on a periodic basis;
- Suppliers must maintain and enforce policies and due diligence for their own staff and suppliers;
- Centerplate and Sodexo reserve audit rights; and
- Suppliers must report suspected breaches and must implement training programmes.

By stipulating warranties, indemnities and termination rights in our supplier contracts, we aim to create a culture of deterrence and compliance in our supply chain.

## Our Effectiveness and Training

To ensure our commitments outlined in this Statement remain top of mind throughout our business, 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 Ethics & Compliance Committee. Testing includes the areas of ethical values, disciplinary measures, whistleblowing, fundamental rights at work, reporting and 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 of 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

**Training** - Since 2016, it has been mandatory for all Centerplate and Sodexo employees in managerial and supply chain roles to complete the training course on Fundamental Rights at Work. To date, over 3,100 employees have completed the course, with the training covering what Fundamental Rights at Work are and why these are so important at Centerplate and Sodexo. 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.

Completion rates are monitored by the company and we have a reporting process in place to ensure our HR Director is notified if anyone has not completed the training within six months. Employees are required to retake their training exercises every three years.

This Fundamental Rights at Work training is also mandatory for the global supply chain team based in the UK and mandatory for all employees in our UK & Ireland Benefits & Rewards business and our Energy & Resources business.

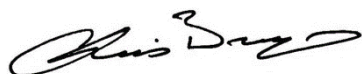
The Ethics & Compliance Committee regularly reviews the legislative requirements, providing updates to the UK and Ireland Sodexo Ltd board, thus ensuring continued executive sponsorship. Progress is monitored by the Risk Management Committee and the Ethics & Compliance Committee.

The team works closely with Sodexo Group representatives to ensure a co-ordinated approach to the topic globally, with a focus on continuing to process, integrate and embed respect for human rights throughout our organisation.

## Looking to the Future

Following a review of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to conduct a periodic review of the measures in place and reflect progress in subsequent annual statements.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.



Chris Bray

Company Director, Centerplate Europe and CEO, Sports & Leisure, Sodexo UK and Ireland