

# Code of Conduct

↗ 2023

newrest



### Why this Code of Conduct?

Our sector is deeply impacted by emerging ethical issues. Preserving the environment, protecting our staff and the individuals within our value chain, guaranteeing our clients' security and the integrity of affairs are absolute priorities for the Group. This Code of Conduct establishes our principles, reaffirms our values, and defines a clear framework to conduct our activities.

We operate in a variety of countries and contexts. This Code of Conduct is a tool to safekeep a common level of social, environmental, and ethical guarantees in all our jurisdictional entities.

### What are Newrest's expectations regarding the application of the present Code?

We expect our employees and partners to familiarize themselves with the present Code and ensure that they clearly understand the Group's expectations. When in doubt, we encourage our employees to seek advice from their supervisor or the most qualified interlocutor and to refer themselves to the additional available resources. Our employees shall conform with all the principles detailed in the present document (see sections *our engagements*) and follow the rules specified in their daily duties and relationships with third parties in the name of Newrest.

We count on each of our employee's vigilance to detect and signal any situation of potential or effective Code violation, according to the Group's reporting procedure. It is everyone's responsibility to respect Newrest's ethical principles in order to prevent situations of non-compliance. In case of violation, Newrest will take the appropriate measures to resolve the situation and repair any damage caused. These measures can include disciplinary sanctions, depending on the level of gravity, the rules of the jurisdictional entity, the applicable collective agreement, and any applicable legislation. We take the violation of our ethical principles very seriously, and we reserve our right to terminate any contractual relations with the concerned party if necessary.

Reciprocally, the Group is committed to protect its stakeholders and to conduct all its relations in conformity with the principles detailed in the present Code of Conduct.

### How to apply these principles daily?

All our commitments are translated in clear and concrete rules of conduct to follow in your position at Newrest and relationship with Newrest or third parties. In addition to these rules, Newrest will comply to all applicable legislation depending on our implantation. We expect the same from our stakeholders. In the case where the obligations specified by the present document would not be equivalent to the applicable legislation, Newrest will always comply to the most ambitious and binding expectations.

This document has been designed as a manifesto to affirm and communicate on our values. It is also a tool for our stakeholders to guide their decision making and to map helpful resources available internally to tackle the different issues that this Code covers.

**Olivier Sadran & Jonathan Stent-Torriani,**  
Co-CEOs



### Exemplarity in business relationships

- 01 → Preventing and fighting corruption
- 02 → Abuse of power or influence
- 03 → Fair competition
- 04 → Transparency with our suppliers



### Ethics

- 05 → Supporting and promoting the development of employees' skills
- 06 → Protecting employees' fundamental rights
- 07 → Guaranteeing responsible working conditions



### Responsibility

- 08 → Reliable financial and non-financial information
- 09 → Whistleblowers
- 10 → Data protection
- 11 → Best practices in the value chain



### Customer service culture

- 12 → Product quality and food safety
- 13 → Customer satisfaction and relationship management
- 14 → Transparency and responsible communication towards our consumers



### Integration of our activities into local ecosystems

- 15 → Preserving the environment
- 16 → Respecting the integrity of territories
- 17 → Supporting local projects



## What is corruption?

Corruption is defined as a situation in which a person **offers or accepts benefits** (money, services, products, gifts, etc.) in exchange for making or refraining from making a decision within the scope of their duties, or for using their influence to obtain an undue decision to the benefit of Newrest. This type of behavior can encompass all your relationships with third parties (public authorities, partners, suppliers, etc.).

**Active corruption** occurs when a person is behind the corruption attempt, and **passive corruption** occurs when a person accepts benefits in exchange for a service or favor.

## Rules of Conduct



### Corruption

- Refuse any involvement in a situation of corruption and report it immediately to your manager or via the appropriate procedure.
- Ensure that gifts or other forms of entertainment comply with applicable Newrest rules and local regulations: exceptional, modest, appropriate.
- Keep a written record of the transaction and systematically notify your manager, regardless of the value of the gift received or offered.
- When in doubt, ask your manager before offering or accepting a gift.
- Consider whether the gift may call your impartiality into question or that of the recipient, or whether it may give the impression of partiality. When in doubt, it is best to refrain from offering or accepting the gift or invitation.

### Facilitation payments

- If a public authority asks you to pay fees for an administrative procedure, make sure that this request is justified by an official document issued by the administration in question.
- When in doubt, refuse payment and contact your manager.
- Be vigilant when a public official contacts a Newrest employee via personal or non-business communication channels.



### Our commitment

Newrest **condemns all forms of corruption**, whether directed at public or private entities. We expect our employees to refuse any **direct or indirect implication** in situations that could be construed as corrupt, and to report them via the dedicated procedures.

### Concrete situations

#### How to know if a gift is appropriate.

##### → Acceptable

Reasonable and appropriate gifts, outside of a tender period:

- Invitation to a restaurant for a business lunch
- Invitation to a cultural or sporting event
- Moderate-value gifts (fine foods, etc.)

##### → Not acceptable

- Cash (loans, credits, transfers, etc.)
- Fine jewelry
- Gifts of excessive value
- Recurring gifts
- Any gift exchanged during a contract negotiation or tendering process
- Any gift, service or favor from third parties, in exchange for benefits or favors



## Toolbox

### Internal reference documents:

- Code of Conduct : *Whistleblowing*
- NGP: fraud alert chapter



## What is an abuse of power?

An abuse of power occurs when a person misuses the power and prerogatives conferred by their status to gain an advantage or act to the detriment of someone else. An abuse of influence involves **using one's status to influence the decision-making** of a person or entity in order to gain an advantage.

These **two forms of abuse** provide illegitimate advantages through two specific situations: **fraud** and **conflict of interest**.

### Rules of Conduct



#### Limiting fraud

- Alert your manager if you find yourself in a situation that could lead to non-compliance with internal procedures.
- Report cases of fraud you suspect or witness via the whistleblowing procedure.

#### Avoiding conflicts of interest

- Notify managers of any potential conflicts of interest, so that they can take appropriate action.
- Do not conduct business with people from your family or close circle of friends.
- Do not personally recruit people with whom you have a personal relationship and whose position could lead you to having a direct subordinate relationship with them.
- When making a decision, assess whether it may have been influenced by personal interest.
- Do not invest in a company that is a competitor of Newrest or in a company with which you have a business relationship in the context of your duties at work.
- Follow procedures defined by Newrest for managing business relationships.

### Our commitment



Newrest is committed to **preventing the risk of fraud and conflicts of interest** by implementing the necessary measures and controls to detect and handle such cases of abuse of power or influence. In addition, Newrest expects its employees to demonstrate exemplary behavior daily. Granted power and responsibilities conferred to Newrest employees shall only be **used for professional purposes** and according to all the principles included in this Code of Conduct.

### Concrete situations

#### How can the risk of abuse of power and influence be prevented?

##### → Do

- Be transparent and disclose potential conflicts of interest or fraud
- Refer to internal procedures and use the whistleblowing tool

##### → Avoid

- Participating in the recruitment process of a close relative or friend
- Conducting a purchasing procedure when a potential supplier is a company in which you have invested
- Maintaining business relationships with people you are close to, on behalf of Newrest



### Toolbox



#### Internal reference documents:

- Code of Conduct : *Whistleblowing*
- Whistleblowing tool on Newrest Group website or on the [home.newrest.eu](https://home.newrest.eu) portal



## What is fair competition?

The notion of fair competition concerns both the **actions** Newrest can take **in regard to its competitors**, and the **protection of its assets** against external unfair practices. **Confidential information** held by Newrest is an important asset in conducting the Company's business.

This type of information concerns both Newrest and its **stakeholders**, and includes trade secrets, expertise, internal financial data and sensitive business information and personal data.

## Rules of Conduct



### Fair competition

In the performance of their duties, Newrest employees must systematically:

- Refuse any activities or agreements with competitors that would directly or indirectly affect prices or reduce competition in one or more markets.
- Refuse agreements with one or more competitors to avoid buying from a supplier (exclusion) or selling to a customer (division of a market).
- Refuse to share sensitive business information or any other practice likely to hinder free competition.
- Refuse facilitation payments or bribes to gain access to markets or influence the choice of contacts.
- Ask the legal team for advice on legal terms and contract clauses that may modify competition rules (exclusive distribution, non-compete clauses or territorial restrictions).

### Protecting Newrest assets

Newrest employees are also required to:

- Use Newrest assets and resources with care and only for legitimate business purposes.
- Not use or disclose confidential or sensitive data pertaining to Newrest or its stakeholders obtained in a professional context, for personal purposes.
- Share confidential information only with authorized persons within Newrest and under no circumstances with third parties (family members, friends, competitors, etc.).

## Our commitment



Newrest is committed to **promoting fair competition in its business activities and practices**, in compliance with applicable laws and regulations.

Newrest complies with **antitrust laws** to ensure free competition and prevent anticompetitive practices.

Newrest will rely on the **quality of its products and services**, as well as the **innovation** and **creativity** of its employees, to compete in the marketplace.

Newrest employees are responsible for **protecting confidential information** relating to the Company and its stakeholders (customers, suppliers, subcontractors and partners).

## Complying with confidentiality rules

All employees must treat any and all information exchanged with stakeholders with the utmost vigilance, in compliance with Newrest confidentiality rules.

### Concrete situations

## What precautions should be taken in the event of unfair competition?

### → Do

- Remain courteous to your contact and ask your manager for advice
- Seek legal advice from the appropriate department before taking action (purchasing department, legal department, etc.)
- If Newrest is or has been the subject of legal proceedings concerning anticompetitive behavior or violations of anti-trust laws: it has a duty to communicate this information (decisions, judgments)

## Toolbox



### Internal reference documents:

- Purchasing procedures
- Industrial property rights agreement (included in supplier contracts)
- Bid analysis grid
- Privacy policy
- Non-Disclosure Agreement (NDA)



### Our commitment

Newrest selects its suppliers and partners **objectively, fairly and transparently**. Our selection processes are open to all candidates and free of favoritism or discrimination. Newrest's relationships with its suppliers are designed to be balanced, transparent and based on **mutual respect for contractual clauses**.

## Rules of Conduct



### Guaranteeing a transparent selection process

- Define transparent and verifiable selection criteria (price, quality, etc.) for choosing service providers.
- Include all relevant information in the tender documents (statement of requirements, contract performance conditions, etc.) and communicate this information to all candidate companies.
- Make decisions in such a way as to avoid any actual or potential conflicts of interest.
- Keep track of bid analyses and purchasing decisions to ensure traceability in the event of a purchasing audit by the Group.

### Defining balanced relationships with our suppliers

- Ensure that contractual documents include all necessary information to establish a relationship with a new supplier or service provider.
- Whenever possible, prioritize out-of-court settlements in the event of claims or disputes with suppliers.
- Comply with current legislation on payment terms with suppliers.



### Concrete situations

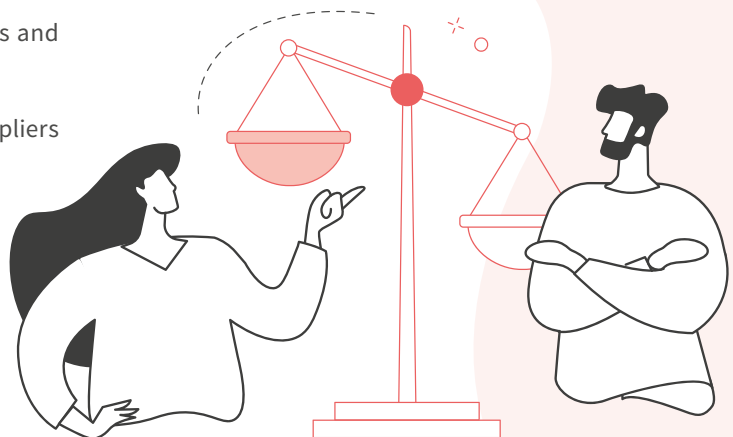
### What precautions should be taken to ensure quality relationships with our suppliers?

#### → Do

- Include details of the stages of the relationship in the contracts: payment, renegotiation conditions, applicable penalties, withdrawal or cancellation periods, order modifications, etc.
- Keep track of the criteria used to select suppliers and the factors that led to the decision
- Save supplier bid analysis grids
- Keep a written record of communication with suppliers in case of a dispute

#### → Avoid

- Using vague or ambiguous terms in contracts
- Missing payment deadlines for invoice payments



## Toolbox



- Internal reference documents:**
- Supplier self-assessment grid
  - Framework agreements
  - Quality assurance policy and manual



## Our commitment

To support its employees in managing their careers and professional development, Newrest has set up a series of measures to enable them to develop their skills and advance within the company.

Newrest offers its employees training in regulation, field expertise and managerial skill development.

These different levels of training enable employees not only to enhance their skills, but also to adapt to customer needs and market trends.

As the expertise and skills of Newrest employees are key elements in customer satisfaction, the Company encourages all employees to develop the expertise they need to carry out their assignments, enabling personal fulfillment and collective success.

Newrest is committed to ensuring that access to promotion is based exclusively on performance and skill, paying particular attention to avoid situations of favoritism and banning all acts of discrimination.

## Rules of Conduct

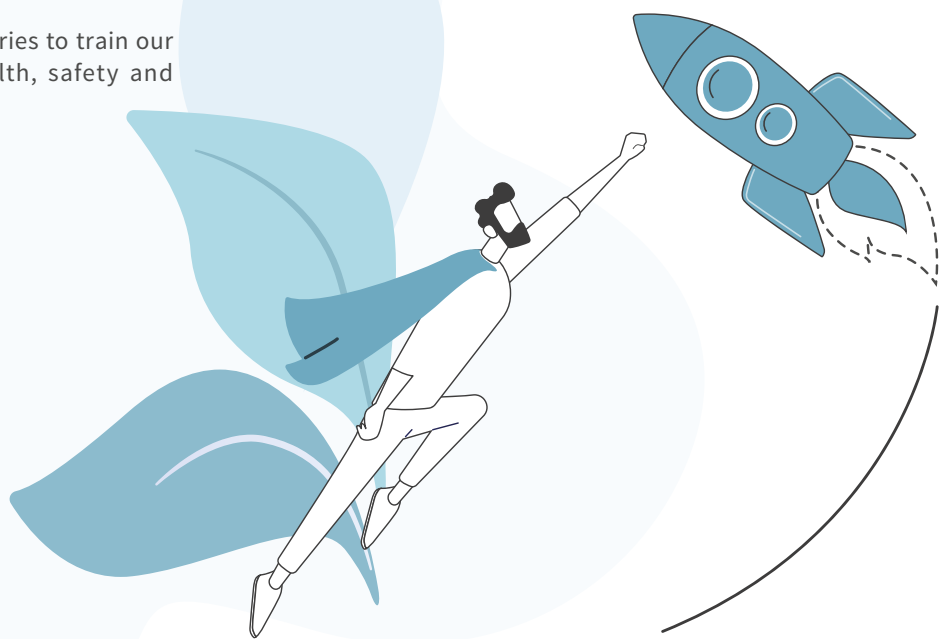


### Career management policy

- Provide equitable access to training for all our employees.
- Ensure compliance with regulations in force on this subject in every country we operate in.
- Provide training tools.
- Digitize training processes to offer innovative skill development methods and ensure regular follow-up over time.
- Support employees through a mentoring system that begins as soon as they join the company and continues throughout their career at Newrest, to help them make the most of their career opportunities.
- Open training centers in certain countries to train our employees in culinary expertise, health, safety and hygiene.

### Professional development tools at Newrest

- Evaluate employee performance, record their expectations and discuss their career paths through professional interviews.
- Create coherent career paths to support employee development within the Group.
- Organize events dedicated to internal training.



## Toolbox



### Internal reference documents:

- › Common foundation of Social Policy, to be amended in line with local regulations, if necessary
- › Common foundation for the annual interview evaluation grid
- › Common foundation for training
- › Employee Advancement Charter





## What are fundamental rights?

Fundamental rights are immutable rights, inherent to the human person. These rights enjoy special protections. Within the framework of professional relationships, the International Labor Organization identifies four pillars:

- The elimination of all forms of forced or compulsory labor
- The effective abolition of child labor
- The elimination of discrimination
- The freedom of association and the effective recognition of the right to collective bargaining

## Rules of Conduct



### Prohibiting all forms of harassment or discrimination

- Create a work environment free of discrimination and which promotes equal opportunity.
- Forbid any and all inappropriate behavior or discriminatory remarks by Newrest employees, customers, partners or suppliers towards anyone.
- Report any and all behaviors, remarks or comments that could be construed as harassment or discrimination.
- These incidents are systematically evaluated and may lead to disciplinary action.

### Fighting against child labor and forced labor

- Ensure that all employees have a valid work contract.
- Only employ people aged 15 or over, except in the context of professional apprenticeships governed by agreements with a training organization.
- Ensure responsible working conditions for all employees by complying with all applicable regulations, including those governing the employment of minors.

### Guaranteeing the freedom of association and the right to collective bargaining

- Do not interfere with employees' freedom of association or right to collective bargaining, including the right to strike when exercised in compliance with international and local regulations.
- Ensure that social dialogue committees are held regularly, in line with local requirements in the host country.
- Take an active part in social dialogue via the management of each organization, with a view to finding shared solutions.

## Our commitment



Newrest guarantees a work environment that respects everyone's dignity. The Group is committed to defending and preserving all the fundamental rights of individuals, as defined in international conventions on fundamental and human rights. The Group is vigilant with regard to the practices of its stakeholders, in its value chain and among its partners, and expects them to share its values.

## Concrete situations

### What behaviors are acceptable in a professional environment?

#### → Acceptable

- Disagreements with colleagues or superiors
- Discussion of personal life (vacations, weekends, family events, etc.)
- Constructive feedback on work

#### → Not acceptable

- Bullying, humiliation, degrading language
- Strong comments on appearance, behavior or dress
- Intrusive comments on private life
- Differential treatment based on personal characteristics (ethnic origin, disability, union affiliation, etc.)
- Psychological and/or sexual harassment
- Physical and/or sexual assault

## Toolbox



### Internal reference documents:

- CSR Charter
- Global Compact COP (Communication on Progress)



### Our commitment

Newrest is committed to making health and safety in the workplace a genuine company culture by deploying trainings and resources.

Newrest is also committed to paying its employees in compliance with the levels defined by applicable regulations in its host countries, and to guaranteeing a quality work environment (rest periods, controlled working hours, etc.).

We make a point of being transparent about all our working conditions and terms of employment upon hiring.

### Concrete situations

#### What precautions should be taken to avoid incidents?

##### → Do

- Wear the safety equipment required for each activity
- Contact the occupational health doctor if the job presents potential difficulties or health risks
- If you are faced with a work situation that presents a serious and imminent danger: exercise your right to refuse unsafe work

##### → Avoid

- Working with damaged equipment
- Working with PPE in poor condition
- Smoking in fire-prone areas
- Direct exposure to cutting hazards and risks from handling chemicals

##### → What to do in the event of an incident?

- Protect exposed persons and yourself
- Notify your line manager, who must follow the QPQS 03 procedure
- Set up the *I Care* program's observation sheets to report good practices, discrepancies, non-conformities and accidents

### Rules of Conduct

#### Ensuring the health and safety of Newrest employees

- Follow the safety instructions defined and communicated by Newrest to ensure a productive, safe and healthy work environment.
- Ensure regular workplace health and safety training for employees.
- Communicate safety instructions to all employees and ensure they are understood by all.
- Ensure compliance with safety rules and the use of personal protective equipment (PPE), and report any violations to the appropriate contacts.
- Verify that all mandatory safety equipment is worn by employees, and that it is in compliance with standards.
- Handle all safety incidents in accordance with Newrest procedures.
- Report all incidents to the Quality, Health, Safety and Environment (QHSE) department, along with associated indicators (conditions leading up to the incident, cause, severity, incidence rate, etc.).

#### Ensuring a healthy work environment

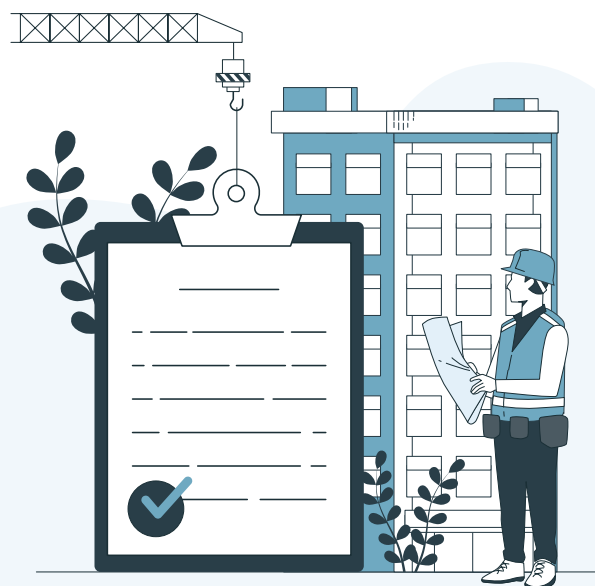
- Be vigilant and limit the physical demand of jobs, which can be linked to significant physical constraints (heavy lifting, awkward postures) or an aggressive physical environment (noise, extreme temperatures).
- Ensure that employment contracts comply with the local Labor Code and collective bargaining agreements, and prioritize contracts that ensure long-term employment.

### Toolbox



#### Internal reference documents:

- Occupational risk assessment document (health and safety prevention plan, (comprehensive workplace risk prevention assessment), etc.)
- *I Care* program
- Job description sheets
- Job safety sheets
- *Calypto*





## Our commitment

Newrest is committed to ensuring that all information produced in the context of its operations is transparent, comprehensive, reliable and true to the reality of the Company's operations. This commitment covers all indicators and operations monitored (financial and non-financial information, operation monitoring, safety, quality, etc.).

## Rules of Conduct



### Comprehensive and reliable financial and non-financial information

- Verify all information communicated for reporting purposes (accounting, quality, etc.). Absolutely no falsification, modification or voluntary omission will be tolerated.
- Transmit all requested information in accordance with the expected formats and deadlines.
- Cooperate with Newrest auditors and pass on information and documents required for audits.
- Save supporting documentation and comply with document archiving and retention policy.

### Vigilance regarding tax evasion and money laundering

- Ensure that transactions are approved and carried out in accordance with the rules and instructions issued by management.
- Be vigilant and report any and all unusual payments (recipients, amounts, associated bank accounts, etc.).



### Concrete situations

#### What precautions should be taken to ensure that Newrest's information is correct?

##### → Do

- Save supporting documentation
- Verify that information complies with Newrest reporting rules (deadlines, scope of collection, consolidation, etc.)
- Have information proofread by a qualified person with reading rights
- Report errors or changes for rectification
- Review values in case of significant changes
- Keep track of activity or transactions
- Transmit requested information in full and on time

## Toolbox



### Internal reference documents:

- Newrest General Procedures VD\_EN\_2018
- Group accounting policies
- SharePoint finance digital work environment



## What is a whistleblower?

A whistleblower can be defined as an individual who discloses **information** about activities deemed illegal, criminal, fraudulent, immoral, dangerous or representing a **threat** to the public interest.

This information can concern a violation of laws and rules ranging from international law to Company regulations. Beyond behavior that does not comply with applicable legislation, whistleblowers can also report any and all behavior that is contrary to Newrest's ethical rules and the principles included in this Code of Conduct.

## Rules of Conduct



### Newrest must:

- Preserve whistleblowers' anonymity and protect them from any and all forms of retaliation.
- Put in place the necessary measures to protect whistleblowers from violence, threats and intimidation.
- Conduct investigations impartially, thoroughly and fairly.
- Process all whistleblower reports.
- Take the necessary steps when the facts reported are deemed to be true.



### Our commitment

Newrest encourages all its employees to follow the whistleblowing procedure if they witness a situation presenting a risk of violation or a proven violation of legislation, the principles of this Code of Conduct or representing a danger or threat to the public interest.

## How to file a whistleblower report?

To file a whistleblower report, go to Newrest Group website home page ([newrest.eu](http://newrest.eu)) and fill in the whistleblowing form: *whistleblowing*.

For Group employees, this link is also accessible from the Newrest SharePoint home page and at [home.newrest.eu](http://home.newrest.eu).

In all cases, the whistleblower's anonymity is preserved. Once a report has been filed, dedicated teams pass it on to the appropriate contact people, who will then decide on the procedure to be followed, depending on the severity of the incident in question.

### Concrete situations

#### How to know if a whistleblower report is justified?

##### → Justified

Following the whistleblowing procedure is justified when the whistleblower is:

- Personally a victim of or witness to a serious situation
- Of good faith and free from any economic interests in the matter

##### → Not justified

Following the whistleblowing procedure is not justified when the whistleblower:

- Would file a report based on facts reported by another person of which he or she has no personal knowledge
- Is acting in bad faith, with malicious intent or has economic interests directly related to the report

## Toolbox



### Internal reference documents:

- Code of Conduct : *Preventing and fighting corruption*
- Code of Conduct : *Abuse of power or influence*
- Whistleblowing form



## Rules of Conduct



### Collecting and processing data

- Obtain informed consent for any data collection carried out within the framework of Newrest's operations and notify the persons whose data is processed.
- Ensure that any processing of personal data is:
  - legitimate - its purpose must be precise, justified and declared in a processing register,
  - relevant - accessible only to those persons and platforms strictly necessary to achieve the purpose of this processing,
  - limited - to the time during which the data is required.

### Storing and archiving data

- Define data retention periods so that they are proportionate to the purpose of the processing and/or comply with legal obligations applicable to the operation.
- Archive data when deletion or anonymization is not possible. Ensure that data can only be consulted by persons authorized to manage this type of data.

### Ensuring data security

- Guarantee the confidentiality, integrity and availability of data by implementing security measures adapted to the risks (illegitimate access, unauthorized modification or loss of data) to which the concerned persons may be exposed.
- For any and all processing of sensitive data, carry out a data protection impact analysis to identify the risks incurred by individuals when their data is processed, and enable the associated risks to be addressed.
- Require contractual clauses containing personal data protection requirements when subcontracting or collaborating with partners.

### Our commitment



Newrest is committed to protecting the personal data of its stakeholders (customers, employees, subcontractors and partners).

It must comply with the obligations of the GDPR\* as well as those relating to the data protection laws specific to its host countries, including those relating to a particular field (for example in France: Loi Informatique et Libertés, Loi pour une république Numérique, Code de la santé publique<sup>†</sup>, etc.).

\*applies to Newrest GROUP HOLDING SA and concerns the rights and obligations of all its subsidiaries, which are located within the European Union (EU).

<sup>†</sup>Data Protection Act, Law for a digital republic, French Public Health Code

### Concrete situations

#### How to handle incidents involving personal data (leaks, theft, loss, complaints, etc.):

Write to [dpo@newrest.eu](mailto:dpo@newrest.eu) or to the local DPO, if applicable:

- Record breaches in the data breach register of the Newrest entity concerned
- Complete an incident report and implement an action plan to prevent a similar incident from happening again
- Notify the persons concerned if the incident may affect their rights and privacy, specifying the nature of the data breach and the measures implemented
- Report incidents to the country's supervisory authority within the maximum time frame specified by current regulations

## Toolbox



### Internal reference documents:

- PDPP (Personal Data Protection Policy)
- ISSP (Information System Security Policy)
- IT Charter
- GDPR documents available on SharePoint





## Rules of Conduct



### Preventing risks and situations of non-compliance

- Ensure that everyone has a good understanding of the social and environmental challenges concerning Newrest's supply chain by raising awareness of responsible purchasing practices.
- Identify and assess social and environmental risks affecting critical purchasing categories.

### Addressing and correcting violations of our ethical requirements

- Report any non-conformity observed among our partners via the Group's whistleblowing procedures.
- Report incidents to management so that appropriate action can be taken in the event of a violation of the Code of Conduct.
- Reassess the continuation of our relationship with a partner depending on the situation of non-compliance or the partner's ability or willingness to comply within a reasonable time frame.
- Terminate agreements in accordance with the terms and conditions agreed upon in the relevant contractual documents and within a reasonable time frame in the event of deliberate, repeated or serious violations.



### Our commitment

We expect our partners to act in compliance with all international and local laws that apply to their area of operation, with codes of good practice in the sector, and with all other requirements to which our organization is subject.

We expect them to act ethically and in accordance with the principles set out in the Code of Conduct:

- Respect for fundamental rights
- Safe and healthy working conditions
- Preventing and fighting corruption
- Fighting against abuses of influence or power
- Complying with rules on fair competition
- Respecting and preserving the environment
- Protecting consumer interests

### Concrete situations

#### How to ensure social responsibility among our suppliers and service providers upon signature of a contract?

##### → Do

- Verify that the self-assessment grid on CSR issues has been completed by suppliers
- Verify that an audit of critical purchasing categories has been carried out or is scheduled
- Notify suppliers and subcontractors that they may be subject to initial assessments, periodic assessments and targeted audits to verify the information they provide
- Ensure that the Code of Conduct is available to partners

##### → Avoid

- Putting partners in a situation that would lead them to violate applicable regulations or the principles of the Code of Conduct

## Toolbox



### Internal reference documents:

- Supplier self-assessment grid
- Framework agreements





### Rules of Conduct



#### Ensuring health and safety with non-negotiable rules

- Apply hygiene measures in the workplace (wearing PPE, hand washing, etc.).
- Comply with workplace restrictions to ensure food safety and hygienic standards (no smoking or eating, no use of certain products, etc.).
- Follow control procedures and ensure product traceability at every stage of production and operations.
- Pay close attention to stock management to avoid product spoilage and follow storage instructions adapted to each product (inspection frequency, ventilation, storage temperature, etc.).
- Ensure the cold chain remains unbroken at every stage.

#### Implementing our quality assurance approach

- Apply the HACCP food safety control plan in all processes, from the selection of suppliers and raw materials to the delivery to the end consumer.
- Train employees in the quality assurance and food safety challenges they face in their fields and provide them with dedicated resources (*I Care* program).
- Monitor and report customer satisfaction, product safety and compliance indicators to the relevant departments.
- Select suppliers in accordance with Newrest's quality assurance and food safety requirements.
- Work with dietitians to offer healthy, nutritious and balanced products.



#### Our commitment

Newrest deploys all the necessary resources to **meet the most demanding standards** in terms of hygiene, quality and food safety.

To achieve this, Newrest applies a **rigorous QHSE approach** to all its sites, through an integrated management system that enables the deployment of **ISO certifications**. Newrest also pays particular attention to the nutritional quality of its products, and to raising awareness of the importance of eating well.

Newrest employees must follow processes that enable them to ensure the **quality and safety** of our products and services, while reducing risk exposure. In addition, Newrest encourages them to be a driving force in identifying areas for improvement, and to report any incidents transparently via the procedure laid out below.

#### Concrete situations

#### What to do in the event of an incident?

##### → Do

- Protect exposed persons and yourself
- Notify your line manager, who must follow the QPQS 03 procedure
- Implement the *I Care* program's observation sheets to report good practices, discrepancies, non-conformities and accidents

##### → Avoid

- Acting outside the procedures defined by Newrest
- Omitting or concealing an incident and/or its causes and consequences



#### Toolbox

##### Internal reference documents:

- Integrated Management System Policy
- Non-Negotiable Rules
- Traceability rules
- Food Safety Management Plan (TD HACCP 01.2)
- *I Care* Observation Card
- SharePoint QHSE (*Calypso* digital training environment)



### Rules of Conduct



#### Ensuring customer satisfaction

- Comply with customer, legal and regulatory requirements by knowing the internal quality assurance rules and regulations associated with Newrest products and processes.
- Transmit all the information required when formalizing a contract (service and pricing conditions, lead times, withdrawal conditions) and related to the service provided by Newrest (details on services, quality commitments).
- Track and measure the satisfaction of our signed customers and end consumers through our loyalty program and customer satisfaction measurement tools.

#### Managing customer relationships and handling disputes

- Comply with all terms and conditions, contractually agreed upon.
- Integrate all customer feedback into a continuous improvement process.
- Understand contractual clauses and communicate customer feedback to the appropriate contacts.
- Refer to the customer communication management system via procedure QP-CS-P2 which allows you to:
  - Identify the root causes of a claim or complaint,
  - Monitor indicators sent to the Newrest Group QHSE team, and construct resolution action plans to be submitted via the *Calypso* tool.
- Monitor and measure customer satisfaction using our *Calypso* tool.



#### Our commitment

Newrest guarantees a **high level of customer satisfaction** by rising to its challenges: anticipating customer expectations, communicating (informing and answering questions) and handling disputes. Newrest's operations and contractual relationships are based on transparency and **honesty** with its stakeholders.

Newrest is committed to implementing a process of continuous improvement in the quality of its products and services in order to **meet the needs and expectations** of its customers and end consumers.

#### Concrete situations

#### What to do in the event of a dispute?

##### → Do

- Immediately notify the branch manager, who must then:
  - Organize a meeting with the customer
  - Ask the customer to restate the reasons for their dissatisfaction. Each reason must be subject a detailed action plan
  - Present the action plan to the customer (with dates, resources, etc.) for approval
  - Implement this action plan
- Handle disputes as quickly as possible
- Prioritize internal mediation measures to resolve situations amicably, in a spirit of partnership
- Resort to external mediation on an exceptional basis after having mobilized all possible internal mediation resources

### Toolbox



#### Internal reference documents:

- › Concentric approach presentation document
- › Product complaint tracking (integrated into the *Calypso* tool)
- › Quality assurance policy
- › Quality assurance manual
- › Product recall procedure





## What is responsible communication?

Responsible communication implies the sender's **responsibility** towards the final recipient and questions the impact of messaging and campaigns. Responsible communication is a broad concept, encompassing communication on issues of sustainable development, the social and environmental impact of the communication itself, and the **authenticity and transparency** of Company messaging.

In this Code of Conduct, Newrest sets out its expectations with regard to the Group's **responsibility to its stakeholders**, and in particular to its consumers.

### Our commitment

Newrest has a moral obligation to its end consumers to provide **clear, comprehensive and verifiable information** on its products and services. All messaging on Newrest products and services is reliable, transparent and ensures **consumer safety**. Newrest expects the same transparency from its direct customers and suppliers, in order to pass on clear information to end consumers.



### Concrete situations

#### How to ensure that messaging adheres to the principles of responsible communication?

##### → Do

Adopt clear, comprehensive, transparent and respectful communication practices:

- Messaging that is focused on important and pertinent product or service information
- Messaging that can be understood even by someone with no knowledge of the subject
- Messaging that is focused on true and verifiable information about Newrest products and services

##### → Avoid

Conveying unclear or ambiguous messaging that may mislead consumers:

- Implying that Newrest products or services have unfounded qualities
- Using partial or misleading messaging (concentrating on minor qualities, exaggerating, etc.)
- Denigrating competitors' products or services, or consumer choices or lifestyles

## Rules of Conduct



- Ensure that all information communicated to the consumer is comprehensive, honest, fair and respectful.
- Ensure that communication relating to products and services meets all local legal requirements (information on environmental performance, origin, etc.).
- Promote a healthy, environmentally friendly diet by informing consumers about the nutritional qualities of our products.

## Toolbox



### Internal reference documents:

- *Display'Eat*, menu presentation tool (allergen logos, labels, diets, etc.)
- Book *The Vegetarian Cookbook* (*Le livret de la cuisine végétarienne*)
- *Planet Newrest Pack*
- *Made in Local Pack*
- Annual entertainment program



### Rules of Conduct



**The Group has structured an IMS policy around the following principles of action:**

- Measuring environmental impacts and risks,
- Reducing our environmental impact,
- Monitoring indicators and striving for continuous improvement,
- Complying with regulations and the objectives of our CSR Charter,
- Imposing strict standards on our suppliers.

### Our commitment



Compliance with international and local environmental laws and the reduction of the impact of its operations on the environment and biodiversity, are among Newrest's priorities. The Group raises awareness of the environmental challenges facing its sector among all its stakeholders, in order to minimize the impact of its value chain.



### The 6 environmental pillars of our CSR approach:

We involve all our stakeholders in developing concrete actions to help reduce the impact of our operations.

#### → Reducing food waste

We work with our employees to reduce upstream food product loss, with our customers to identify areas for improvement, and with our network of partners to avoid wasting unsold food and dispose of our biodegradable waste responsibly.

#### → Improving waste management strategy

We seek to implement a waste management approach based on the principles of a circular economy and invite our employees to be agents of change by supporting the creation of new recycling and up-cycling channels.

#### → Promoting a sustainable purchasing approach

We prioritize national and local purchases, as well as products originating from environmentally friendly agricultural practices, and raise awareness of the impact of our purchases among our stakeholders.

#### → Committing to the reduction of single-use plastics

We encourage the use of solutions that limit plastic consumption while complying with necessary hygiene and safety conditions.

#### → Developing paperless processes

We deploy digital solutions and raise awareness of the need to reduce on-site paper use among our employees.

#### → Reducing greenhouse gas emissions

We are deploying a strategy, mobilizing all Newrest teams, aimed at reducing our energy and water consumption. We are progressively training our teams on the subject, and also supporting our customers in this process.



### How to integrate them in daily operations?

Consult our CSR Charter and discover the various possible actions by scanning this QR Code.



### Toolbox



#### Internal reference documents:

- CSR Charter
- CSR Report
- I Care approach, Environmental Pillar
- Imp'act approach
- Planet Newrest Pack



## Rules of Conduct



### Ensuring political and religious neutrality

- Refrain from taking any political, moral or religious stances via the Group's communications media.
- Do not position yourself as a representative of Newrest when taking a political, moral or religious stand.
- Do not involve Newrest in the direct or indirect financing of political or trade union parties or movements, or of religious organizations or movements.
- Do not involve Newrest in the financing or sponsorship of associations or events whose purpose is to relay a political or religious message.

### Respecting stakeholders in host territories

- Comply with current local regulations.
- Build sustainable relationships based on trust and transparency.
- Respect the fundamental rights of local players and support the right of peoples to ensure their economic, social and cultural development.
- Pay attention to our sites' impacts on water, soil, power sources, etc.

### Considering the geopolitical context

- Prioritize employee safety in the event of conflict or war in host territories.
- Pay particular attention to developments in the political situation in our host territories, so that the Executive Committee can take them into account when making decisions.
- Systematically consider the aforementioned principles when evaluating a market opportunity.



### Our commitment

All Newrest employees and those working in its subsidiaries represent the Group's values. Newrest's objective is to maximize the positive impact of its business on the territories and societies in which it operates, and to conduct its operations in harmony with the local socio-economic and political context. Newrest is vigilant in ensuring that its subsidiaries respect the Human Rights of their stakeholders.

### Concrete situations

#### What behavior to adopt in daily operations?

##### → Do

- Maintain cordial and transparent relationships with site neighbors
- In case of questions, contact the legal department and redirect to press releases or public documents

##### → Avoid

- Taking a stand on political or religious issues with Newrest's official social network accounts, your professional email address, your professional networks or in the workplace
- Disclosing confidential information



## Toolbox



Internal reference documents:  
 → CSR Charter



## Rules of Conduct



- Maintain privileged, sustainable and transparent relationships with all producers to support or assist in the development of local industries.
- Comply with all local and international regulations protecting the communities and lands where Newrest operates (protection of ecosystems, local and national rules on waste management, etc.).
- Consider all local stakeholders to build relevant projects that benefit everyone and minimize potential negative impacts.
- Prioritize the recruitment of local personnel and internal promotion.
- Help local players develop their skills through training and partnerships with local training networks.
- Monitor the distribution of local and expatriate employees by gender and professional category in our operations.

## Our commitment



Newrest has a responsibility to support local communities and preserve their expertise. Newrest mobilizes its teams in its host territories to support local projects in line with the challenges our organization is facing. Our objective is to prioritize local and responsible purchasing, to encourage the use of local distribution networks and reduce the number of intermediaries between producers and customers.

In each country where Newrest operates, we prioritize *local sourcing* and create partnerships with local producers or cooperatives whenever possible, thus ingraining ourselves into the life of our local communities.

## Concrete situations

### How to support local purchasing?

#### → Do

- Prioritize national and local sourcing (with equivalent specifications)
- Monitor the proportion of purchases made from local suppliers (percentage of products and services purchased locally)
- Prioritize seasonal produce, in collaboration with local players, when preparing menus

#### → Avoid

- Not being transparent about resources used for projects and developments

### How to support projects linked to Newrest's value chain?

#### → Do

- Finance or sponsor local associations in the form of actions or donations
- Define accounting rules to specify the resources mobilized to support local projects
- Be transparent about the resources used to prevent the risk of corruption or the misappropriation of funds



## Toolbox



Internal reference documents:  
 ▶ CSR Charter

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