

gategroup Slavery and Human Trafficking Statement

Our Organisation

gategroup is the global leader in airline catering, retail-on-board and hospitality products and services. We provide passengers with superior culinary and retail experiences, leveraging innovation and advanced technology solutions. Headquartered in Zurich, Switzerland, gategroup deliver operational excellence through the most extensive catering network in the aviation industry, serving more than 700 million passengers annually from over 200 operating units in over 60 countries/territories across all continents. In 2018, gategroup reached CHF 4.9 billion in revenues generated by approximately 43,000 employees worldwide.

<https://www.gategroup.com/en-gb/about/>

gategroup operations in the UK & Ireland consist of 11 operational units and offices. gategroup and all its subsidiaries understand the potential modern slavery risks related to its business and continue to put in place steps to ensure that there is no slavery or human trafficking in the business and its supply chains.

We are responsible for ensuring an average of 50,000 individual items are procured, packed, and transported onto every flight. We perform these complex services through:

Pre-Flight Cart Packing, Delivery and Galley Loading

We orchestrate the assembly of meals according to specifications, pack the service trolleys in the prescribed manner, stage the carts for loading in controlled coolers, and execute delivery in high-loader trucks to provision the aircraft's galley accurately and on time.

Post-Flight Aircraft Stripping; Equipment Washing and Sterilisation; Trash Disposal

We remove carts from arriving aircraft and take them to the flight kitchen for unloading and sanitisation. At locations set up for recycling, refuse is sorted accordingly. For international flights, we separate trash from the general waste stream according to regulations and sterilise it before disposal. Re-usable items such as crockery and cutlery are sent through the dishwashing/sterilisation line. Carts are thoroughly washed and sterilised, according to specifications, and the trolleys undergo safety inspections to check for proper functionality.

Inventory Management, Including Bonded Warehouses

We maintain separate and controlled equipment storage areas for each customer. Our employees collect the data for inventory management either through the customers' system or via gategroup's proprietary software, providing confidence that optimal supplies of any service item are always available, inventory is tightly controlled, and waste is minimized.

Our Suppliers

We understand that our suppliers often have their own complex supply chains, which makes it difficult for us to directly monitor or control the working conditions of each individual entity within a multi-step supply chain. We are committed to reducing supply chain complexity so that any vulnerabilities can be more easily identified and addressed.

Due Diligence

Our suppliers are subject to an on-boarding procedure through our Supplier Management System that incorporates a risk-based assessment of their policies and practices. Any supplier breaches that are discovered will be fully investigated and where possible remedied. The breach may lead to termination of the supplier if the breach cannot be satisfactorily remedied.

Compliance with all legal requirements, forms a crucial part of our contracts with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

Our Commitment

gategroup is a global leader in airline catering and hospitality goods and we are dedicated to providing passengers with a superior and responsibly sourced culinary experience. As part of this commitment, the organisation recognises that it has a duty of care to its employees, both current and future, to take a robust and proactive approach in identifying and abolishing any form of modern slavery.

We are committed to continually monitoring our status as an equal, ethical and diverse employer and have set a plan in place for the coming financial year to maintain this philosophy. As an organisation we will listen to our employees and suppliers and ensure that all concerns raised by any means are thoroughly investigated and we expect our suppliers to operate in the same manner.

Our Policies

gategroup operates a number of key policies which describe its approach to the identification of and prevention of unethical practices:

Code of Conduct <https://www.gategroup.com/en-gb/investors/corporate-governance/>

The organisation operates a comprehensive Code of Conduct which includes, but is not limited to, the following elements:

- Diversity - Our global community includes people of all races, ethnicities, ages, genders, nationalities, marital status, sexual orientation, gender identity, religions, disabilities and cultures.
- Compliance with Law – We comply with all applicable laws and regulations.
- Anti-harassment and discrimination - We have a zero-tolerance policy against discrimination and harassment in all its forms.
- Anti-bribery - We believe in doing business with integrity and do not offer nor accept bribes of any kind.
- Corporate Social Responsibility - We are committed to operating in an ethical manner, treating our employees and suppliers fairly and with a mutual respect.
- Whistleblowing – gategroup maintains an alert-line known as ‘Speak-Up’ which provides an outlet for all employees to raise concerns about the conduct of others in the business or the way in which the business is run as a whole.

Our Training

All Gate Gourmet employees receive a copy of our Code of Conduct upon joining the business. This sets out how the company expects its employees to act honestly, ethically and lawfully.

The Code of Conduct sets out guidelines for;

- Making ethical decisions
- Be willing to speak out
- Live by the Company Values
- Comply with the Law
- Treat each other fairly
- Respect Company Property and Information
- Deal fairly with our Business Partners
- Act responsibly as a global Company

Every employee is required to read and understand the Code of Conduct and to provide written acknowledgement confirming this to our HR Department.

Next Steps

gategroup will take immediate action in the event of evidence of any identified slavery or human trafficking activities.

Over the course of the next financial year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers. Below are some of the examples of how we intend to do deliver this:

Awareness

Continue to develop staff awareness of the Modern Slavery Act 2015 and the reporting mechanisms in place if a case of slavery or human trafficking is suspected.

Procurement

The company will ensure that when reviewing or obtaining new arrangements with suppliers that our Code of Conduct around Supply Chain is part of the terms of business and subject to their agreement.

Supply Chain

The company will continue to work closely with all their suppliers to ensure their supply chain standards are transparent and meet the appropriate requirements. Our supply chain and procurement employees will work alongside our legal teams to ensure any concerns that arise are dealt with as part of our company policies as indicated in this document.

This statement has been formally approved and signed by a member of the Executive Team on behalf of Gate Gourmet London Limited.



Mark Turner
Managing Director UK&I