

Supplier Code of Conduct

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Table of Contents

- 1. Introduction..... 3**
- 2. Scope..... 3**
- 3. “Fundamental rule” – Suppliers to comply with the law 3**
- 4. Main Principles 4**
 - 4.1. Supplier – Internal Framework..... 4
 - 4.1.1.Risk Management..... 4
 - 4.1.2.Health & Safety 4
 - 4.1.3.Labor practices 4
 - 4.1.4.No child labor 4
 - 4.1.5.Freedom of association 4
 - 4.1.6.No discrimination 4
 - 4.1.7.Privacy 5
 - 4.1.8.Accounting and taxation 5
 - 4.2. Supplier – External Behavior 5
 - 4.2.1.Environment..... 5
 - 4.2.2.Origin of products and services and transparency along the supply chain 5
 - 4.2.3.Fair competition 5
 - 4.2.4.Anti-bribery 6
 - 4.2.5.Sanctions, no money laundering..... 6
 - 4.2.6.Conflicts of Interest..... 6
 - 4.2.7.Communication 6
 - 4.2.8.Intellectual Property..... 6
 - 4.2.9.Whistleblower system..... 6
 - 4.2.10.Documentation 6
 - 4.3. Due diligence, questions / concerns and non-compliance..... 7
 - 4.3.1.Due Diligence 7
 - 4.3.2.Questions / Concerns 7
 - 4.3.3.Non-compliance 7
- 5. Revision History 7**

1. Introduction

We are committed to conduct our business in an honest, ethical and lawful manner, aim to apply the highest standards and strive to operate in a socially, environmentally and economically sustainable way. Our internal code of conduct, gategroup's ethical compass is helping us to ensure that we always do the right thing.

On the other hand, strong business partners contribute to a positive impact also on the ecological and social aspects of our business activities. As we perceive our Suppliers as very relevant stakeholders, supporting us and contributing to our sustainable growth and helping us to achieve our ambitious goals, we rely on them to create value and respect environmental aspects, human and labor rights. Consequently, we have clear expectations how to cooperate with them.

At gategroup, we aim to source in compliance with ethical principles and sustainably and to demonstrate responsible supply chain management. Therefore, and to ensure our own standards, our Suppliers are required to explicitly acknowledge and adhere to the standards described in this Supplier Code of Conduct and to apply the same principles in their own supply chain, meaning to ensure that their own suppliers will comply with these principles.

At the time of issuance of this Supplier Code of Conduct, gategroup has committed to joining the UN Global Compact. In its efforts to further improve, gategroup will continue to commit to further initiatives and periodically update this Supplier Code of Conduct.

2. Scope

This Supplier Code of Conduct applies to all suppliers, their employees and sub-contractors providing products, materials, expertise and related services to any entity of gategroup worldwide (the "Suppliers"). It sets out the essential minimum requirements expected from each Supplier and flanks the Suppliers' commitments under applicable laws and contractual arrangements.

3. "Fundamental rule" – Suppliers to comply with the law

Suppliers are expected to not only comply at all times with local, national and international laws in force and effect at their legal seat, the place of performance and the place of delivery and final destination of the products and services and with their internal policies but to also strive to meet especially high social, human and employment rights, environmental and anti-corruption standards.

4. Main Principles

4.1. Supplier – Internal Framework

4.1.1. Risk Management

Suppliers have an effective risk management process in place for managing and documenting at least the risks addressed by this Supplier Code of Conduct. The Suppliers' risk management must include a review and documentation along their entire supply chain.

4.1.2. Health & Safety

Suppliers provide healthy and safe workplaces for their employees, respect their dignity, privacy and rights and have the required permits, licenses and permissions granted by the competent authorities to run their activities and operations.

Suppliers do not tolerate illegal drugs or abuse of alcohol or other controlled substances which can have a harmful effect on safety, productivity, attitude, reliability and judgment.

4.1.3. Labor practices

Suppliers uphold the human rights of workers and apply for them safe, fair, and decent working conditions, high labor standards and welfare at work, including fair payment, overtime hours, and benefits from social security schemes. They do not use forced, bonded or prison labor. Suppliers acknowledge the prohibition of all forms of slavery, slave-like practices, servitude or other forms of domination or oppression in the workplace environment, such as extreme economic or sexual exploitation and humiliation, and undertake to adjust their operations to ensure full compliance with these standards.

4.1.4. No child labor

Suppliers respect and adhere to the prohibition of child labor as defined in the applicable laws and international conventions.

4.1.5. Freedom of association

Suppliers respect the rights of workers as set forth in local laws, especially their freedom of association and collective bargaining.

4.1.6. No discrimination

Suppliers ensure a workplace that is free from sexual, racial, religious or other unlawful harassment or discrimination, whether verbal, physical or otherwise. This means that employment related decisions are based on relevant and objective criteria only.

4.1.7. Privacy

Suppliers safeguard and make only proper use of confidential information and personal data to ensure applicable data privacy rights are protected.

4.1.8. Accounting and taxation

Suppliers fully and fairly disclose their financial condition in compliance with applicable accounting and taxation principles, laws, rules and regulations. They ensure that the information they record is honest, accurate and clearly understandable and documents, financial records and other information are retained in accordance with the applicable laws and regulations.

4.2. Supplier – External Behavior

4.2.1. Environment

Suppliers operate in an environmentally responsible way and contribute positively to the climate and biodiversity by making best efforts to recycle, reduce emissions, energy and water consumption and decrease waste from their products and processes. For this purpose, Suppliers observe the prohibition of causing harmful soil change, water pollution, air pollution, harmful noise emission or excessive water consumption, that significantly impairs the natural basis for the preservation and production of food, denies a person access to safe drinking water, makes it difficult for a person to access sanitary facilities or destroys them; or harms the health of a person. Furthermore, Suppliers observe the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters in the acquisition, construction or other use of land, forests and waters, the use of which secures the livelihood of a person. In addition to this, Suppliers observe the prohibition of the manufacturing and the use of mercury-added products, and the treatment of mercury waste, the prohibition of non-environmentally sound handling, collection, storing, disposal of waste and exporting of hazardous waste according to the internationally effective agreements and conventions.

4.2.2. Origin of products and services and transparency along the supply chain

Suppliers conduct their business with gategroup in an open and transparent way, which includes providing transparency of material flows and material origin as well as production conditions throughout the entire supply chain, providing evidence of product identity and respective proof that no adulteration has happened, with the overall objective to ensure the supply of responsibly produced products.

4.2.3. Fair competition

Suppliers believe that free, fair and open competition ensures high quality and innovative products and services. They avoid improper actions that exclude, restrict or distort competition or could be perceived as being an unfair-dealing practice.

4.2.4. Anti-bribery

Suppliers comply with all applicable anti-bribery laws of the countries where they do business. In particular, they avoid offering, giving and receiving directly or indirectly anything of value to obtain or retain business or seek favorable treatment for themselves or a third party.

4.2.5. Sanctions, no money laundering

Suppliers comply with all applicable trade and economic sanction regimes and must not facilitate money laundering directly or indirectly via intermediaries.

4.2.6. Conflicts of Interest

Suppliers will avoid activities and interests that may influence their business relationship with gategroup and will disclose promptly and as permitted under the applicable laws any actual or potential conflict of interest to gategroup.

4.2.7. Communication

Suppliers communicate with the public in an honest, open and consistent voice.

4.2.8. Intellectual Property

Suppliers value the intellectual property rights of gategroup and others and do not undertake any steps to harm them.

4.2.9. Whistleblower system

Suppliers shall ensure that an appropriate internal or external company complaints procedure is in place for their company and along their complete supply chain. The complaints procedure shall enable persons to report actual or potential compliance issues, including human rights and environmental risks as well as violations of human rights-related or environmental obligations that have arisen as a result of the economic actions of a company in its own business area or of a direct supplier. Suppliers have to give clear and comprehensible information on accessibility and responsibility and on the implementation of the complaints procedure publicly available in an appropriate manner. The complaints procedure must be accessible to potential parties, maintain confidentiality of identity, and ensure effective protection against disadvantage or punishment on the basis of a complaint. The effectiveness of the Supplier's complaint's procedure shall be reviewed at least once a year.

4.2.10. Documentation

The fulfillment of the obligations pursuant to this Supplier Code of Conduct shall be documented on an ongoing basis by the Suppliers. The documentation shall be kept for at least seven years from the

date of its creation. Suppliers shall prepare an annual report on the fulfillment of this Supplier Code of Conduct and make it available if requested by gategroup’s procurement department.

4.3. Due diligence, questions / concerns and non-compliance

4.3.1. Due Diligence

gategroup reserves the right to check and monitor existing and new Suppliers for compliance with this Supplier Code of Conduct on a regular or ad-hoc basis if necessary. This check and monitoring will be carried out at least once a year and when there is a concrete reason to do so, in particular as a result of information from the whistleblower system of an actual or potential compliance breach. Alternatively, and to the sole discretion of gategroup, this verification may also be carried out by specialized independent third parties.

4.3.2. Questions / Concerns

In case of any questions or uncertainties, the Suppliers seek advice and address it pro-actively towards gategroup. “I did not know” as a justification, once an issue happened, will not be an acceptable excuse for gategroup. Any concern or actual or potential non-compliance discovered by any Supplier or an employee or a third person can be reported to the publicly open SpeakUp Line (gategroup’s confidential independent whistleblower service) via <https://speakupline.gategroup.com>.

4.3.3. Non-compliance

If gategroup discovers that a severe violation of this Supplier Code of Conduct has already occurred or is imminent, it will immediately take appropriate remedial action to prevent or end this violation or to minimize the extent of the violation. If Suppliers cannot end the violation within reasonable time, gategroup will immediately implement a concept to end or minimize the violation. This concept will contain concrete actions of the Supplier and a timetable for its implementation. A corrective action plan will be established, and the process monitored by gategroup. gategroup, however, reserves the right to suspend or even terminate the business relationship in the event of breaching any main principle of this Supplier Code of Conduct and, if necessary, to take legal action and claim damages.

5. Revision History

Version	Date	Author	Change Description
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