



Code of Conduct

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A message from our CEO



Every employee is a key contributor in making gategroup a great place to work. The success of gategroup requires all parts of our business to work together to achieve our goals. When we work as a team, whilst at the same time taking responsibility for our individual actions, we achieve the best results for gategroup, both now and in the future.

gategroup's Code of Conduct ensures that we conduct our business in an honest, ethical, and lawful manner. It outlines the behaviors and ways of working that we must commit to and encourage in our colleagues. Essentially, it guides us in making the right decisions.

The Code of Conduct sets out what is expected of each and every one of us, both as individuals and as one gategroup. It also explains the processes for ensuring that this is achieved consistently across our organization. Our Code of Conduct comes to life through our values: Excellence, Passion, Respect and Responsibility. These values should be lived in everything we do, every decision we make and every interaction we have, both with our colleagues and with our customers and business partners.

The Code of Conduct will help ensure you always do the right thing. Please read it carefully and follow its guidance. I am confident that if we all do this, we will make gategroup a great place to work and a great company to do business with.

Christoph Schmitz
CEO, gategroup



About our Code

Why do we have a Code of Conduct?

Our Code of Conduct (the “Code”) provides guidelines for the ethical behavior we expect from one another and what our stakeholders can expect from gategroup. All employees, officers, directors, and all others acting on behalf of gategroup (including consultants, contractors, suppliers, agents, and joint ventures) must comply with the Code. The Code unifies our global organization, with the standards of behavior it sets out. The Code also captures our values and reflects our pride in being a responsible corporate citizen.

Our purpose and values

At gategroup, we believe food and travel have a common purpose. Both nourish the soul and give us the means to maintain the human connections that matter most to us.

Nourishing the Journey, expresses our relationship with the journeys each of us take - both through the world, and through our lives. In every moment and at every time, we nourish and support that journey.

In every culture on Earth, food is more than a human need: It’s a means of self-expression, The way we treat our guests is more than a standard of service: It’s a measure of who we are. The food we serve and the rituals we share say something very powerful about ourselves. We strive to create exclusive experiences through sight, smell, taste, touch, and sound as we take our customers on a unique sensory journey.

Our values — Excellence, Passion, Respect and Responsibility — are the building blocks that unite our global community. These values are the foundation of everything we do and are essential to the success of our employees and the business as a whole.

While the Code and our values may not address every specific situation we may encounter in our day-to-day interactions, they serve as the guidelines for how we behave. Regardless of the task at hand, please be mindful of how you personally demonstrate and live gategroup’s values.



Excellence

- We put the customer at the forefront of everything we do, taking time to understand their needs, wishes, and desires.
- We marry creativity with innovation and the power of data to deliver experiences that exceed the expectations of every customer.
- We constantly learn by giving and receiving feedback, improving from our mistakes, and bettering ourselves.
- We are agile, flexible, and open to change, always looking for the best way to serve our customers.



Passion

- Hospitality, in its purest form, comes down to a single, core principle: care. We do everything with thoughtfulness, attention, and care.
- We have a passion for results that are always in line with our customer's success.
- We go the extra mile, taking ownership of our work.
- We have a growth mindset, a resilience that makes us determined to bounce back from failures and setbacks.



Responsibility

- We care about what we do, and we understand the impact we have on others and the planet.
- We display courage in everything we do. We are not afraid to use our voice and speak up.
- We believe in and pursue personal growth. We take the development of our skills, goals, and ambitions seriously.
- We always look out for each other. Creating a safe workplace environment is everyone's responsibility.

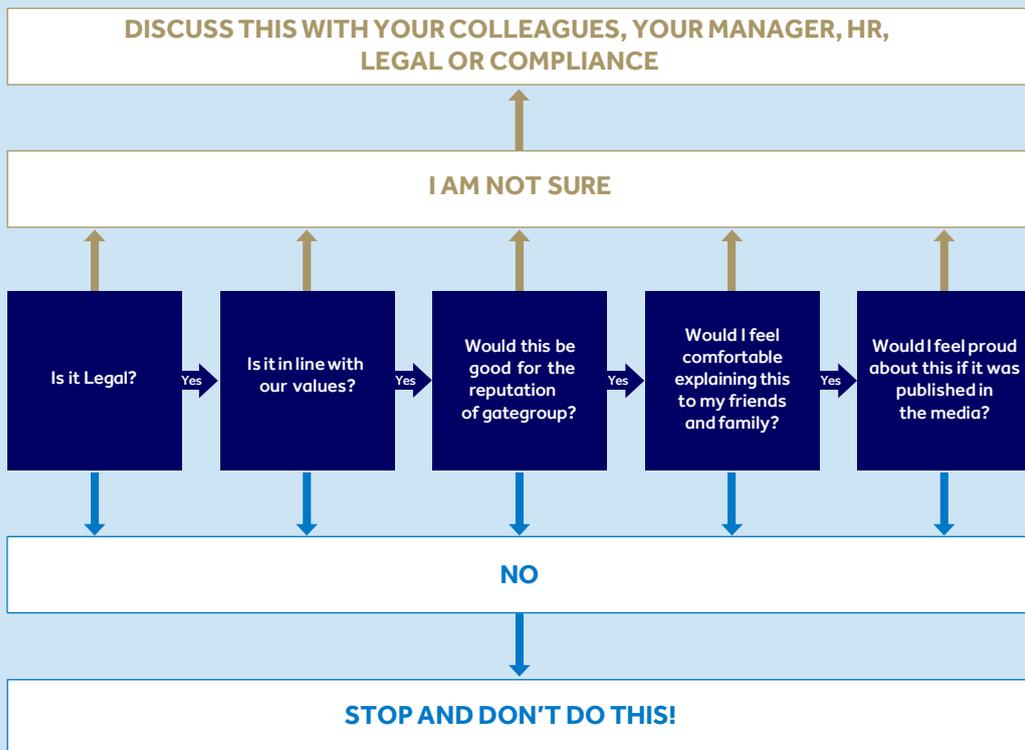


Respect

- Every job matters. We each do our part to ensure our colleagues and our customers succeed in their goals.
- Success should be celebrated. We appreciate and value our people and the work they do, and we recognize and reward the successes they achieve.
- We respect each other's voices and foster a workplace that supports inclusion and belonging. We are all one gategroup.
- We are OneTeam. We collaborate with good intent and take pride in being reliable for our customers and colleagues.

Making ethical decisions

Beyond understanding gategroup's policies as they relate to your daily responsibilities, the best way to make sure you are complying with all applicable laws is to be transparent. Even if you believe your actions support gategroup's business goals, it is important for each of us to work in a manner that is open and honest. Whenever you're in doubt, ask yourself the following questions:



If you answer "No," or "I'm not sure," make sure that you first consult your manager, Legal Department, or another team (if appropriate), to make sure you're making the right decision.

Quality



At gategroup, our commitment to customer satisfaction is unwavering.

Why it is important

We prioritize quality because it enhances customer loyalty through the consistent delivery of outstanding solutions with reliable outcomes that meet customer expectations.

What we do

In our work, we always adhere to the requirements of our Quality Management System (QMS) to:

- Strictly comply with agreed customer quality requirements.
- Identify, evaluate, and control quality risks.
- Follow quality requirements to ensure customer satisfaction.
- Take action to identify, record, and correct problems, prevent non-conformance, and trigger continuous improvement processes.
- Report and address all quality issues.
- Build and promote a culture of quality.
- Regularly train our staff on specific quality topics relevant to their roles.

What we do not do

- Accept instructions that compromise our quality principles or food safety rules.
- Tolerate or ignore poor quality standards.
- Fail to act upon noticing a quality issue.

We place the customer at the forefront of everything we do.

Hospitality, in its purest form, comes down to a single, core principle: care. We do everything with thoughtfulness, attention, and care.

Further information

- QHSSE integrated Policy
- gategroup Quality Policies and Procedures

Food safety



Food safety is essential to gategroup. At gategroup we firmly believe that food safety is key to maintaining a satisfied customer base.

Why it is important

gategroup is a food company. gategroup's success is dependent upon our ability to control food safety throughout the entire process from receiving to production and final dispatch, to ensure that our food is safe for human consumption and in compliance with applicable legislation and standards.

What we do

In our work, we always make sure to follow all the requirements of our Food Safety Management System (FSMS) to:

- Strictly comply with relevant Food Safety regulations in place.
- Ensure that food safety hazards that may be expected to occur are identified, evaluated, and controlled.
- Correctly follow personal hygiene requirements.
- Initiate action to identify, record, and correct problems and prevent non-conformance and trigger a continuous improvement process.
- Report and address all unsafe acts and conditions.
- Build and promote a food safety culture.
- Regularly train our staff on specific food safety topics relevant to their position.

What we do not do

- Accept instructions if they go against Food Safety rules.
- Tolerate or ignore poor standards of food safety.
- Fail to act after noticing a food safety issue.

We never compromise when it comes to food safety!

By prioritizing food safety, we can create safer food environments and healthier communities worldwide.

Further information

- QHSSE integrated Policy
- gategroup Food Safety Policies and Procedures

Health & safety



Our overall safety objective is for every employee, subcontractor, and visitor to return home to their family and friends every day, healthy and whole.

Why it is important

It is important for each of us to do our part in ensuring a safe workplace by complying with health and safety requirements. We report unsafe equipment, practices, conditions, illnesses, or other hazards. Our goal is zero workplace injuries.

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

Ramp Safety refers to the standardized actions, activities, and procedures placed by gategroup to ensure that our activities related to flight catering services are safe, efficient, and consistent.



What we do

- Strictly comply with relevant Health and Safety regulations in place.
- Always wear the appropriate personal protective equipment (PPE- safety glasses, face shields, slip-resistant shoes, safety vests, hearing protection, freezer gear, gloves, etc.) associated with your job function. Your supervisor will let you know what specific PPE is required to safely perform your job.
- Always use proper lifting techniques (with a straight back, squat with your legs shoulder width apart, use leg muscles, keep the load close, don't twist at the waist while lifting). If the load is heavy or awkward, ask for help.
- Report all accidents, incidents, near misses, injuries, risky behaviors, or property damage to your supervisor IMMEDIATELY – no matter how minor.
- Always observe and comply with all safety instructions and postings (i.e., signs, chemical products labeling, placards, wet floor stands, Safety Alerts, PRIDE Briefings, FMT Posters, etc.).
- Housekeeping is part of everyone's job. Always keep your work area clean, neat, and free from hazards (If you cannot correct an unsafe condition report it to your supervisor).
- Report and address all unsafe acts and conditions to your supervisor.

What we do not do

- Do not operate any equipment unless you are trained and licensed in its use. If you have any questions about how to do a job, ask your supervisor.
 - Never work near or on any moving equipment that has its safety guards removed.
 - Never remove any lockout tags, locks, safety signage labels or guards, or modify equipment.
 - Never give more importance to “hurry” than to safety. Remember: Safety First!
-

Nothing we do at gategroup is more important than SAFETY!

4C's Coaching Model

Always remember to use the “4 C's” coaching model:

1. COMMUNICATE the behavior you saw simply and immediately.
2. CHECK for understanding of the job. Has everyone learned the proper procedures?
3. COACH for improvement by asking questions and sharing ideas: “How could this job be done more safely?”
4. CONTRACT for future safety by mutual commitment to any changes in at-risk behaviors

[Further information](#)

- QHSSE Integrated Policy
- gategroup Policy and Procedures

Security



We are all responsible for security. We always protect the security of our employees, their family, our visitors, subcontractors and customers as well as our assets.

Why it is important

Everyone deserves a safe workplace, free from fear and threats. Security is a shared responsibility each of us is crucial to preventing potential disasters. A single breach, a single unauthorized access, an overseen forbidden item - could have serious consequences. Our commitment to security is vital to protect lives and our company's reputation.

What we do

- Strictly comply with relevant security regulations in place.
- Familiarize ourselves with the existing security procedures and adhere to them to maintain a secure environment.
- Wear visible badges and ensure that others in our facilities do the same.
- Take responsibility for safely accompanying visitors.
- Use locks and seals diligently and manage group information responsibly.
- Each gategroup location shall conduct a security risk assessment.
- Report any suspicious activity. We are always alert to the presence of prohibited items in our facilities. If they are detected, we immediately notify the manager.
- All employees are regularly trained in Security topics.
- If you are not sure if something is in line with our Security standards, check with a supervisor or with the Security responsible for your facility.

What we do not do

- Override rules and procedures.
- Giving unauthorized persons access to a location.
- Share information about our location to outsiders.
- Ignore or tolerate potentially insecure situations.

Ensuring a solid security system is essential in our company, not just to safeguard our customers and the services we provide, but also to prioritize the safety of our employees.

Security in our company goes beyond Aviation Security. It is also about safeguarding our assets, employees, and operations from potential threats or risks. At gategroup, we are all responsible for security!

[Further information](#)

- QHSSE Integrated Policy

Sustainability



As one of the global culinary leaders, we are fully committed to responsible corporate stewardship and sustainable business practices.

Why it is important

As one of the world's most diversified food companies, our responsibility is to use our influence and proactively engage with key stakeholders along our value chain to drive change and improve the sustainability of food as well as reduce waste and associated impacts.

Our goal is to hold ourselves accountable by being transparent, to take care of our employees, retain and attract talent, consistently reduce our impact on the planet, ensure that we incorporate sustainability drivers in the design of our products and services and manage opportunities and risks in our supply chain, all while also responsibly strengthening our bottom line.

We see our responsibility along gategroup's entire value chain and have set aspirations and targets for the near- and long-term on the key material topics for our business.

✔ What we do

Addressing Environmental matters at gategroup:

- We are committed to minimizing our environmental impacts across our operations by developing systems to monitor and reduce water use, waste sent to landfill & incineration, and greenhouse gases.

Addressing Social matters at gategroup:

- Our communities matter. We commit to creating a responsible and caring culture that supports our people and external communities from the grassroots level.

Addressing Governance matters at gategroup:

- Transparency builds trust and accountability. As an industry leader, we must ensure everything we do aligns with best practices and applicable international reporting frameworks.

✘ What we do not do

- Engage in deliberate, incorrect self-promotion on ESG topics for marketing purposes without tangible actions by the company – no greenwashing.
- Engage with business partners that act against our ethical and environmental standards.

Transforming together for a more sustainable tomorrow.

We care about what we do, and we understand the impact we have on others and the planet.

Further information

- Supplier Code of Conduct
- Human and Labor Rights policy

More information about all our sustainability efforts can be found on our website:
<https://www.gategroup.com/sustainability/>

Environment



We commit to managing and minimizing our environmental impact. We care about what we do, and we understand the impact we have on others and the planet.

Why it is important

Environmental management is an integral aspect of gategroup's overall ESG strategy. We understand that our business has a significant environmental footprint, and we have a responsibility to do our part to minimize it. We therefore established environmental ambitions and targets for water, waste, and energy management, and we are committed to putting relevant actionable measures in place and tracking and reporting on our progress.

What we do

Strictly comply with relevant Environmental regulations in place.

Water

From the farmlands we rely on for high-quality ingredients to the kitchens where we prepare meals and sanitize cookware, water plays a vital role. We recognize that protecting this vital natural resource is not only important from a humanitarian perspective but also critical for our business operations.

Waste

At gategroup, we understand the significant impact that waste has on the environment. That is why we are taking a serious approach to reimagining our waste management processes and diverting otherwise valuable resources from being landfilled and/or incinerated.

Energy, Climate Change & GHG Emissions

gategroup recognizes that, as a provider of CO₂-intensive services, the company has a responsibility to participate in the transition to sustainable energy sourcing and use.

In order to effectively manage our environmental footprint, we rely on sound data. Therefore, on a continuous basis, we collect and analyze environmental utility information from across our global network of locations.

What we do not do

- Wasteful use of water.
- Incorrect disposal of waste.
- Inefficient use of energy.
- Ignore or accept any suspected or known violations of our environmental policies and standards.

Every day, we make efforts to recycle, reduce emissions and decrease waste resulting from our products and processes.

- As one of the global culinary leaders, we are fully committed to responsible corporate stewardship and sustainable business practices.

Further information

- QHSSE Integrated Policy
- Supplier Code of Conduct
- <https://gategroup.com/sustainability>

Workplace behavior and diversity, equity & inclusion



We foster a culture that makes every employee feel valued and welcome.

Why it is important

gategroup delights in its diversity. gategroup's global community includes people of all origins, ethnicities, ages, genders, nationalities, marital status, sexual orientation, gender identity or expression, political opinions, religions, beliefs, disabilities, and any other status protected by applicable law ("Diversity Parameters"). gategroup's diversity sparks new ideas, thoughts, and creative solutions. It reflects the global community in which gategroup operates.

We will not tolerate disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind.

Harassment is not tolerated in the workplace or in any work-related circumstance outside the workplace.

✔ What we do

- Promote the equality of opportunity and employment in the workplace, regardless of any individual difference, which can be defined as "Diversity Parameters" and promote a culture of performance, skills, and experience.
- Support the principles and practices of equal opportunity in employment and career progression.
- We make employment-related decisions based on job requirements and qualifications.
- We are committed to equal opportunities in recruiting, hiring, pay, performance reviews, training, development, and promotions.
- We treat everyone with respect.
- We intervene when we notice inappropriate behavior towards colleagues.
- We are committed to a workplace that is free from sexual, racial, religious, or other unlawful harassment or discrimination, whether verbal, physical or otherwise.

✘ What we do not do

- Tolerate the possession, use or distribution of pornographic, racist, sexist, or otherwise offensive materials.
- Bullying or harassing behaviors are not allowed and will be acted upon.

We recognize the importance of building a company culture in which our diverse communities can thrive. We believe that by breaking down barriers and creating an inclusive environment, we can harness the power of our differences. We respect each other's voices and foster a workplace that supports inclusion and belonging. We are all one gategroup.

Examples of harassment, sexual harassment, or discrimination:

- Sexual, racial, or other offensive jokes and comments.
- Unwanted touching.
- Leaning over or cornering someone.
- Emailing jokes, images or other material that are discriminatory or sexual in nature.
- Teasing that is humiliating, unwelcome by the recipient or that is based on a person's physical appearance.
- Spreading gossip or rumors, whether true or false, which are perceived as demeaning or create an uncomfortable work environment.

Always ask yourself: "How would I feel if someone said or did this to me or to a family member?"

Bear in mind what is and is not verbal harassment. For example, feedback or criticism is not necessarily verbal harassment in itself, even if you feel upset by it.

Further information

- Global Labor & Human Rights Policy
- Please refer to the local Anti-Discrimination and Anti-Harassment policies for more information

Respecting human rights



Respect for human rights is a fundamental component of gategroup's values and business principles.

Why it is important

Respecting human rights throughout our operations is fundamental. Respecting human rights is important for our people, our external reputation, our supply chain sustainability, and our license to operate. We require our suppliers to comply with, or exceed, international labor standards via our Supplier Code of Conduct and procurement processes.

We respect the most fundamental of human rights including no child labor, no forced labor, and the freedom of association.

✔ What we do

- Pay attention to our peoples' health, safety, dignity, and well-being.
- Follow our employment policies and procedures.
- Apply the due diligence procedures in our procurement processes.
- Consider human rights within potential new investments and joint ventures.
- Work with our suppliers to improve supply chain standards by actively communicating our Supplier Code of Conduct.

✘ What we do not do

- Engage with third parties or suppliers that do not adhere to our human rights standards.
- Employ any person under 15 years old, or less than the local minimum employment age.
- Fail to speak up if we see a human rights violation.

Respect for human rights and diversity remains ingrained in our corporate values, as reflected in our group-wide Global Labor & Human Rights Policy. We are OneTeam. We collaborate with good intent and take pride in being reliable for our customers and colleagues.

gategroup Supplier Due Diligence

Our suppliers are subject to an on-boarding and monitoring 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.

Further information

- Supplier Code of Conduct
- Global Labor & Human Rights Policy

Fighting bribery and corruption



gategroup is committed to conducting business in accordance with the highest ethical standards and strictly prohibits all forms of bribery and corruption.

Why it is important

We believe in doing business with integrity. Bribery harms our Company, customer relationships and communities.

gategroup will always conduct business in a fair, correct, and legal manner and we won't engage in any unfair business practices.

✔ What we do

- Comply with all applicable anti-bribery and anti-corruption laws in each country in which we operate.
- Follow the appropriate procedures regarding gift and entertainment expenses.
- We are committed to securing and retaining business on the excellence and integrity of our products and services.
- Follow the appropriate procedures regarding donations and community projects.
- Speak-up whenever we have doubt about a potential business partner.

✘ What we do not do

- Give and receive anything of value (such as cash, a job, stock, or gifts) to obtain or retain business, or seek favorable treatment.
- Give, solicit, or accept any gift or entertainment in exchange for gategroup business or an obligation to do something in return.
- Pay so-called 'facilitation payments' or 'grease payments.' They are also considered bribes and are prohibited.

We believe in doing business with integrity. Bribery harms our company, customer relationships, and communities. We display courage in everything we do. We are not afraid to use our voice and speak up.

Third parties are sometimes needed to support gategroup in doing business. These may be regular suppliers, where the Procurement, Finance, ESG, Legal, and Compliance Departments conduct reviews according to our internal procedures.

In addition to regular suppliers, there are also other kinds of third parties, such as:

- Advisors/consultants interacting with government officials on our behalf
- Advisors/consultants engaging in sales activities on our behalf
- Agents
- Distributors
- Industry associations
- Joint venture partners
- Lobbyists
- Specific shareholders for new entities

Third parties engaged by gategroup must also comply with the gategroup Code of Conduct and this gategroup Global Anti-Bribery and Anti-Corruption Policy. Specifically for third party due diligence there is the global gategroup **Third-Party Due Diligence Procedure** that must be followed.

Gifts and Entertainment

As a general rule, employees should consider whether any gift or entertainment costing more than CHF 200 per person is reasonable and appropriate.

If you wish to give or receive gifts or entertainment valued at more than CHF 200, you must obtain prior approval from the Legal and Compliance Department, in addition to budget approval from your manager. This approval can be requested digitally using the Gifts and Entertainment Approval Form.

Further information

- Anti-Bribery and Anti-Corruption Policy
- Third-Party Due Diligence Procedure
- Donations and Community Engagements Procedure
- [Compliance Hub](#)

Fair competition



We believe that free and open competition ensures high quality and innovative products and services.

Why it is important

Competition laws are designed to encourage a free market and protect consumers and businesses. While these laws are complex and vary from country to country, we need to respect and comply with them. Failure to do so can have serious consequences such as large fines, reputational damage or even imprisonment.

✔ What we do

- Operate and compete independently of our competitors.
- Avoid discussing any commercially sensitive topics with competitors such as pricing, terms, and customer information.
- Limit interaction with competitors and seek legal advice before entering into any type of commercial interaction with a competitor.
- Exercise a high level of caution in trade association meetings.

✘ What we do not do

- Make improper actions that restrict competition, including discussing with a competitor about prices, costs, production, or customers.
- Engage in collaboration with potential competitors without coordinating this first with the Legal Department.

Protect Commercially Sensitive Information

Commercially Sensitive Information may include information about:

- Pricing or pricing strategies
- Costs or cost elements
- Revenues, profits & margins
- Output & capacity
- The (current) marketing strategy or upcoming advertising & promotions
- Information on specific current negotiations or contracts with customers or currently processed requests by customers
- Other business or strategic plans

Please take appropriate measures to prevent that this information can be shared with competitors of gategroup, for example by using the 'confidential'-sensitivity label in Microsoft applications.

Further information

- Competition Policy
- Procedure on data classification

Using company resources responsibly



We are all responsible for protecting gategroup property. We use company property for business purposes, and not for personal activities.

Why it is important

Company resources include budget, information systems (such as laptops and phones), equipment (such as vehicles), facilities, information, intellectual property, and company time. These resources are supplied to us for business purposes. Inappropriate use of company resources has a direct impact on the profitability of our business.

What we do

- Use company resources where it is intended for and with due care.
- We spend company budgets in the best interests of the company.
- We comply with company policies on travel and expenses.
- We value our intellectual property. gategroup's trademarks, copyrights, designs, brands, software, trade secrets, and patents are important assets that we all must protect.

What we do not do

- Use company resources for personal gain.
- Use company resources in a way that could compromise our business.

We are accountable for appropriate use of company resources

Check question:

- Do you take the same care in protecting the company resources as you would if they were your own?

Further information

- IT Acceptable use Policy

Protecting confidential information



We only share confidential information with those who need it.

Why it is important

gategroup's confidential information is a valuable asset that is very important to our success. We are all responsible for protecting gategroup's confidential information, unless disclosure is necessary to comply with court orders or government investigations.

Remember that gategroup's confidential information belongs to the Company. You may not use confidential information for any personal benefit or the benefit of anyone outside of gategroup.

gategroup information should be used only for company purposes and should not be disclosed to anyone outside of the company.

Your confidentiality obligations to gategroup continue after you leave the Company. If you leave gategroup, you must return all company materials and property, and any copies.



What we do

- We take reasonable physical and electronic measures to safeguard gategroup's confidential information.
- Only share confidential information with proper authorization for legitimate business purposes.
- Be suspicious of strange-sounding callers and call your contacts back as a precaution, checking to confirm information.
- Always lock computer screen.
- Document and file confidential information appropriately.
- Use strong passwords.
- Apply the appropriate IT-security tools to protect our information.
- Store confidential information in a secure place and not left out where others can see it.

What we do not do

- Talk in private about confidential gategroup matters.
- Make use of confidential information from a former employer.
- Actively seek out confidential information without a business need.
- Leave confidential information unattended.
- Share corporate information on social media.
- Store company information on personal devices.

Only share confidential information on a need-to-know basis. Even within the company, only those individuals who truly need to know the information to conduct their business should have access to confidential information.

Confidential Information is non-public business information, including:

- Sales and profits figures, pricing, strategic plans, new products, research & development ideas as marketing plans.
- Potential mergers and acquisitions and divestitures.
- Information about our customers, suppliers, or joint venture partners, which have been disclosed to gategroup under an obligation of confidentiality.
- Trade secrets, patents, IT architecture documents, and other intellectual property.
- Lawsuits and other legal proceedings.
- Fellow employee or customer personal information.

Further information

- Information Security Policy
- Data Privacy Policy
- IT Acceptable Use Policy
- Data Classification Procedure
- Data Retention Policy

Protecting data privacy



Personal data needs to be handled with care.

Why it is important

Personal Data means any information relating to an identified or identifiable natural person. It can be related to gategroup employees, customers, or suppliers.

gategroup is strongly committed to safeguarding privacy of employees, customers, and all other stakeholders.

gategroup processes personal information for our business. This personal information may reside on digital computing systems, networks, or backup devices, or may be recorded on paper or other recording media. For the success of our business, it is important that we keep that data secure and only use it where it is intended for.

✓ What we do

- Ensure compliance with all applicable international, federal, state/provincial, and local laws and regulations as well as applicable contractual agreements.
- Properly secure personal information.
- Protect the rights of our customers, partners, suppliers, and business contacts and their personal information.
- Protect gategroup from the risk of a data breach.
- Use personal information only for predefined purposes or purposes that are compatible.

✗ What we do not do

- Click on suspicious links and attachments.
- Choose insecure passwords and thus open the door to our data for hackers.
- Leave our laptop unlocked.

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- In the event of a Data Protection Incident (loss, theft, unauthorized access), you must immediately report it via the ServiceNow Form or via email: servicedesk@gategroup.com. Also, inform your manager.
 - Even if you are not 100% sure that the data may be compromised, you must report this.

Employee, customer, and supplier personal data must be kept confidential. Unless you have authorization, never access, attempt to access, or share another person's:

- Social Security Number
- Home address
- Medical information
- Age, race, religion, ethnicity, or national origin
- Marital status or sexual preference
- Salary or performance ratings

Further information

- Data Privacy Policy
- Personal Data Processing Requirements Procedure
- Data Retention Policy
- If you have any questions on data privacy, please contact gdpr@gategroup.com

External communication and social media



Use Social Media in a positive way.

Why it is important

We are all responsible for our postings on social media. Both during working hours and in our personal time, any posting on social media about gategroup companies, employees, customers, business partners, and competitors must be responsible and correct. Never reveal confidential information or be offensive.

✔ What we do

- Before engaging with the media in any way, always involve Corporate Communications department first.
- Always be respectful to others when making any statement on social media.
- Try to focus on positive messaging.
- If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it.
- Be diligent in making sure that what you post is factual and correct.

✘ What we do not do

- Do not disclose any work-related confidential or proprietary information.
- You must not make any social media communications that could damage our business interests or reputation, whether directly or indirectly.
- You must not express statements on behalf of gategroup to external media, via social media, unless expressly authorized to do so by the Corporate Communications department.
- Refrain from posting about controversial topics.
- Spend too much time on social media, so much so that it interferes with our work and safety.

Guidelines for functioning in the digital social media world are the same as the values, ethics, policies, and rules that you as employee are expected to live every day, in real life communication.

Questions to ask yourself:

- Could what I am posting have a negative impact for gategroup?
- Am I in a position to comment on a topic relating to gategroup?
- Is my post accurate and truthful?
- Do I really need to post this?

Further information

- [Communications SharePoint](#)

Procurement and Supply Chain Management



Logistics, procurement, and supply chain management are among gategroup's core strengths. We source items responsibly and want to manage our supply chain risks responsibly.

Why it is important

At gategroup, we aim to source in compliance with ethical principles and demonstrate responsible supply chain management.

Responsible and sustainable sourcing, in accordance with our values, helps mitigate risk and build trust. We work to ensure that our suppliers are socially, legally, and ethically responsible, treating the people who work for them fairly and with dignity.

✓ What we do

- We follow our established procurement procedures.
- We undertake due diligence as appropriate on prospective business partners that present heightened risk relating to human rights, health and safety, the environment, corruption, fraud, or antitrust to ensure that we conduct business only with suitable and reputable business partners.
- We seek to avoid actual or potential conflict of interest arising from the selection or use of a supplier.
- We look for suppliers that aim for a higher level of sustainability of their products.
- We actively communicate and enforce our Supplier Code of Conduct.

✗ What we do not do

- Accepting suppliers who are actively using child labor, forced labor, or other forms of modern slavery.
- Engaging suppliers if we suspect that such activity will violate export or sanctions laws or regulations.

We regularly review our suppliers using objective criteria, such as suitability of product or service, price, quality, performance, ESG-score, trustworthiness, and reliability. We continue to work on increasing our supply chain network's transparency and improving the sustainability of the products we source. Identifying risks and opportunities within our supply chain is a crucial topic for business continuity, customer satisfaction, regulatory compliance, and steering gategroup's indirect impact on sustainable development around the world.

Further information

- Supplier Code of Conduct
- Authority Matrix

Conflict of interests



We will always act in the best interest of gategroup.

Why it is important

A conflict of interest can arise when employees have a personal interest in a transaction or situation that could affect their business judgment, loyalty to gategroup, or work performance. We are therefore transparent about relationships, financial investments, second jobs, or other opportunities that may influence gategroup's business in any way. We are each responsible for promptly reporting any actual or potential conflicts of interest to our direct supervisors, human resources representative, or a member of the Legal team, and for seeking advice from the Legal team if we are unsure.

✓ What we do

- We avoid situations where personal activities, interests, or relationships could affect, or be perceived to affect, our decision-making or work performance.
- We proactively disclose any potential conflict of interest to our manager and HR, even if we think it will have no influence on our judgment or performance.

✗ What we do not do

- Engage in outside interests that compete with gategroup.
- Seek business opportunities for ourselves by making use of the gategroup resources or network.

Make your business decisions in the best interests of gategroup, without bias or unfair favoritism.

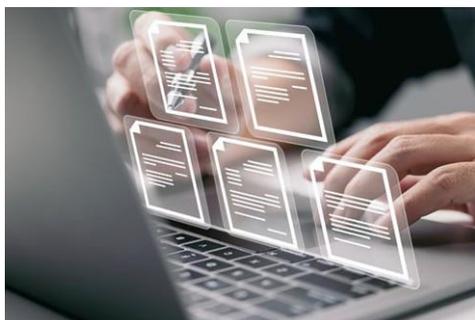
What is a Conflict of Interest?

Conflicts of Interest are situations where your personal interest can influence the interest of gategroup. It can arise from a number of situations. For example:

- A partner, family member, or close relative is employed by one of our competitors, suppliers, or customers.
- A romantic relationship involving an employee and their manager.
- An employee, partner, family member, or close relative has a substantial financial interest in a current or potential competitor, supplier, or customer.
- A second job competes with or causes issues with an employee's ability to do their job.

If you have any reason to believe that you are, or may be, in a position where a conflict of interest could arise, the best thing is to discuss this with your manager and HR.

Accurate accounting and internal controls



We maintain a system of internal controls for ensuring accurate books and records.

Why it is important

We must make our decisions based on accurate and correct information. For our stakeholders, we must provide financial information that is accurate and complete. To be able to do this, gategroup maintains a system of internal controls to ensure that our books and records fully and objectively reflect our business and financial transactions and their underlying business purpose in a materially accurate manner. These principles apply as equally to large transactions and financial reporting as they do to reporting smaller matters, such as timekeeping and reporting business expenses. We are also all responsible for retaining documents, records, and information in accordance with local laws.

What we do

- We only execute transactions in accordance with this Code, applicable policies, procedures, and laws.
- We only approve transactions within the scope of our authority, as defined in the Authority Matrix.
- We are honest, transparent, and timely in our engagement with auditors and tax authorities.

What we do not do

- We do not intentionally create false, incomplete, or misleading entries in our books or records.
- We do not hide errors or issues in our financial administration.

All data that we create, whether financial or non-financial, must accurately reflect the transactions and events covered.

- If you have difficulty in understanding what is needed for a correct administrative documentation of a transaction, reach out to your manager, the finance function, or internal audit.

[Further information](#)

- Authority Matrix

Insider trading



Never use inside information for trading in securities.

Why it is important

Insider trading is prohibited because it gives those who have access to material non-public ("inside") information an unfair advantage over other investors who do not have such information. Everyone within gategroup is responsible for keeping inside information confidential and refraining from insider trading.

Members of the 'insider group' (Board, EMB, Group Finance, Financial Planning and Analysis, Corporate Communications and Investor Relations, Group Legal, M&A and Investments, Regional Presidents and Regional CFOs) are subject to general restrictions on trading in gategroup Securities due to their access to confidential information on a regular basis.



What we do

- We follow procedures regarding information security to prevent inappropriate access to material non-public information.
- We keep inside information confidential.



What we do not do

- We do not trade in the securities of gategroup or any other company when in possession of material non-public information relating to such company.
- We do not advise, encourage, "tip off" or otherwise cause others to trade in the securities of gategroup or another relevant company when in possession of material non-public information.
- We do not share or disclose material non-public information of gategroup or another company unless authorized to do so.

Trading in shares or securities based on inside information or material non-public information, or providing such inside or material non-public information to others who might trade, is a serious offence and may result in criminal prosecution.

It is the responsibility of every individual to comply with rules on insider trading.

What are some examples of inside information? Inside information includes material non-public information about:

- Mergers and acquisitions
- Divestments
- Changes in the Executive Board
- Projected financial earnings or losses
- Strategic business plans
- Profit warnings
- Pending lawsuits or investigations
- Fines and product liability
- New brands, products, and other innovations

Further information

- Securities Trading Policy

Reporting concerns

The gategroup Code of Conduct reflects our commitment to a strong ethical culture via our values as the foundation of how we do business. We are each accountable for our actions, and gategroup is prepared to ensure that the organization is managed in line with our commitment. You can help us achieve this goal.

In gategroup, it is desired that we have an open culture where people can voice out their concerns directly. Sometimes you may have doubts or are faced with difficult decisions or situations that need an ethical reflection. By sharing our opinions and concerns together we can improve and become more effective. By addressing health and safety issues, conditions, or any other improper behavior, we can reduce risks and resolve issues which helps us to create a better, safer workplace for all.

If you have a concern about a possible breach of the Code of Conduct, you should speak-up. It is recommended that you first speak to the relevant person or your Line Manager about it face-to-face. If you are uncomfortable with this for any reason, you can also contact a member of Human Resources or someone from the Legal & Compliance Department directly. If you believe that the issue cannot be resolved through normal business channels, then you can use the gategroup Integrity Line system.

Reporting a Concern via the Integrity Line

The Integrity Line system is managed by an independent third party. This assures protection and confidentiality for the reporter and provides the option to report anonymously if needed, anywhere and anytime in your native language. The Integrity Line system is not intended to replace local procedures but offers employees an additional alternative to reporting problems in a secure manner. The Integrity Line is also accessible for third parties like suppliers or any other stakeholder that wants to report a concern to gategroup.

[Integrity line | gategroup](#)

[More information can be found here:](#)

- Integrity Line Policy
- Investigation Procedure

No Acceptance for Retaliation

We do not tolerate retaliation against an individual who discloses an actual or suspected breach of the Code or helps with an investigation. Any employee who raises a compliance concern in good faith acts in the interest of gategroup and deserves acknowledgement. gategroup does not tolerate any retaliation against any employee who raises a compliance concern in good faith.

Retaliation may result in discipline, up to and including dismissal.