

GATE GOURMET (HOLDINGS) PTY LTD

MODERN SLAVERY STATEMENT Financial year 2023



This Modern Slavery Statement is made by Gate Gourmet (Holdings) Pty Ltd on behalf of the entities it controls and owns in Australia.

Gate Gourmet Holdings is required to publish a statement under the Modern Slavery Act 2018 (Cth) and has published a Modern Slavery Statement 2023 on the Public Register.

**GATE GOURMETHOLDINGS
MODERN SLAVERY STATEMENT 2023**

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Gate Gourmet Holdings - 2023**Modern Slavery and Human Trafficking Statement****1.0 Australian Reporting Entity**

The reporting entity, Gate Gourmet (Holdings) Pty Ltd, is a foreign owned private company, fully owned by Gate Gourmet Switzerland GmbH headquartered in Zurich, Switzerland and is part of the gategroup of entities with the ultimate parent company being gategroup Holding AG.

Gate Gourmet (Holdings) Pty Ltd derives its revenue from the provision of catering, retail services and support logistics to both aviation and non-aviation customers in Australia and New Zealand. The entity employs approximately 825 people and is administered from its head office in Mascot, New South Wales.

This Modern Slavery Statement is made by Gate Gourmet Holdings Pty Ltd on behalf of the entities it controls and owns in Australia and is intended to comply with the Modern Slavery Act 2018 (Cth).

Gate Gourmet Holdings has therefore published this Modern Slavery Statement, endorsed by the Board of Directors, on the Public Register.

2.0 Our Organisational Structure, Operations and Supply Chain**2.1 Our Global Organisational Structure**

gategroup is a global leader in airline and non-airline catering, retail-on-board and hospitality products and services. gategroup provides its' customer with superior culinary and retail experiences, leveraging innovation and advanced technology solutions. Headquartered in Zurich, Switzerland, gategroup delivers 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.

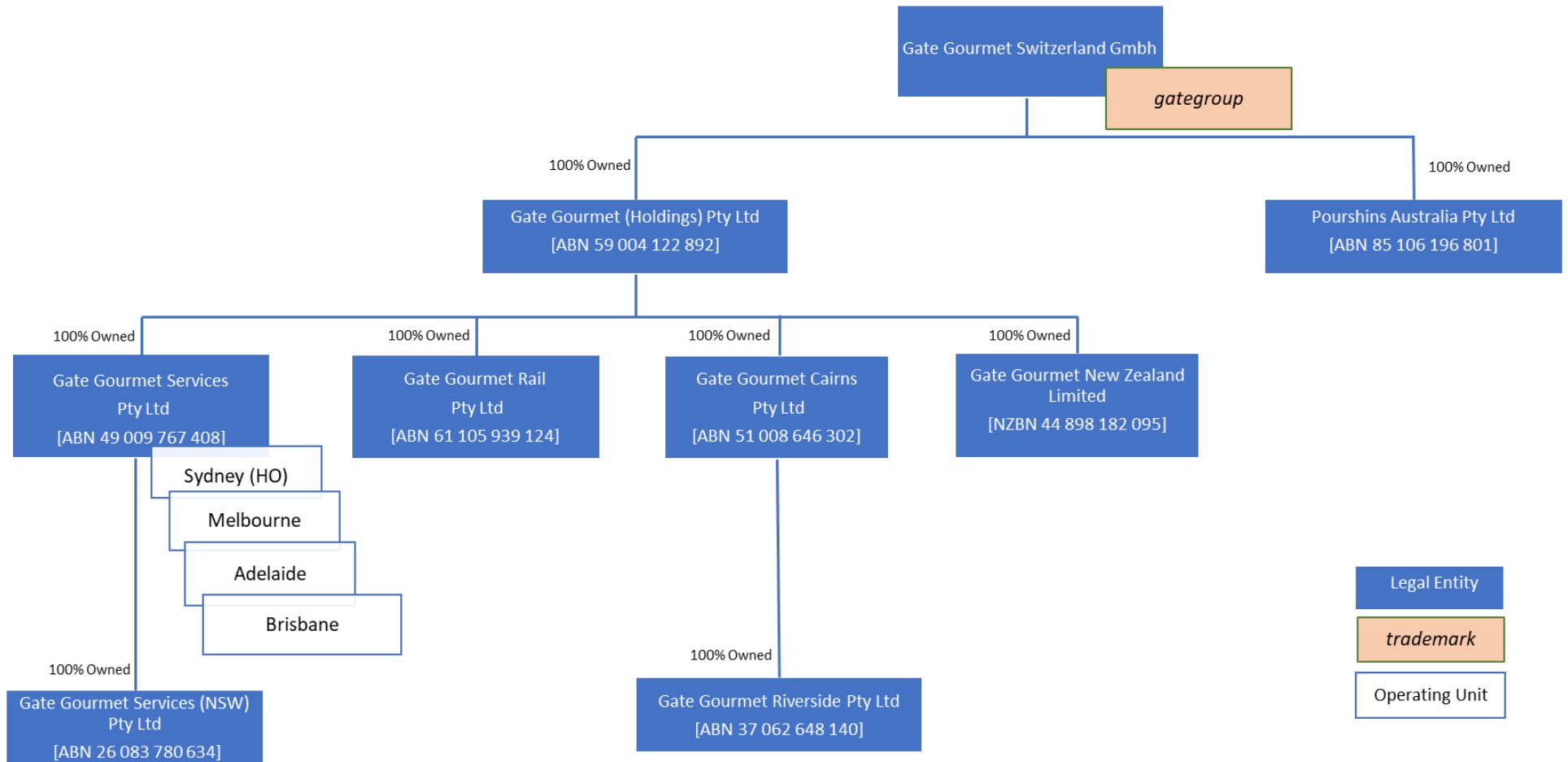
gategroup operates under four key brands:

- Gate Gourmet the leading global provider of airline catering solutions and provisioning services for airlines, both in-flight at over 200 airports as well as at airport lounges. From menu design through execution and delivery, our passion is giving our airline customers and their passengers an exceptional experience.
- Gateretail is a leading airline retailer with extensive knowledge and experience in food and beverage and travel retail. With a global customer portfolio covering four continents, we serve more than 20 airline customers on over 1000 aircraft to more than 315 million passengers a year. We innovate and deliver profitable retail programs that meet the needs of our airline partners and exceed passengers' expectations.
- Servair provides inflight services including catering as well as airport and complementary services with the ambition to turn the quality of its service and innovation into performance levers for airlines.
- deSter is all about creating exciting and inspiring in-flight service and hospitality concepts, providing customized catering equipment to exhilarate the onboard experience.

gategroup has also lodged a statement to comply with the requirements of section 54 of the United Kingdom Modern Slavery Act 2015.

gategroup

Diagram 1 – Gate Gourmet (Holdings) Pty Ltd Organisational Structure



2.2 Gate Gourmet (Holdings) Pty Ltd Operations

The reporting entity Gate Gourmet (Holdings) Pty Ltd (“Gate Gourmet”) is made up of several legal entities, as shown the organisation structure Diagram 1: Gate Gourmet (Holdings) Organisation Structure above. The revenue from each of the legal entities is consolidated into Gate Gourmet (Holdings) Pty Ltd for reporting of the consolidated annual financial results in accordance with AASB10.

While New Zealand is not included within the scope of this Moderns Slavery Statement, the policies and procedures apply equally to New Zealand.

Entity	Operating Unit (note 1)	Services
Gate Gourmet Services Pty Ltd, ABN 49 009 767 408	Sydney Melbourne Adelaide Brisbane	<ul style="list-style-type: none"> ➤ Food production for airline & non-airline customers ➤ Packing, delivery and loading (logistics) ➤ Retail services including packing and selling ➤ Post-service removal of equipment, equipment washing and sterilization; waste disposal ➤ Management, administration and corporate support
Gate Gourmet Rail Pty Ltd, ABN 61 105 939 124	Sydney	<ul style="list-style-type: none"> ➤ Production and packaging of food for NSW Trains ➤ Pre-departure cart packing, delivery and loading (logistics). ➤ Management, administration and corporate support
Gate Gourmet Cairns Pty Ltd ABN 51 008 646 302	Cairns	No operations
Gate Gourmet Services (NSW) Pty Ltd ABN 26 083 780 634	Sydney	No operation
Gate Gourmet Riverside Pty Ltd ABN 37 062 648 140	Sydney	No operations

Note 1: See section 7.1 for the impact of COVID on Gate Gourmet (Holdings) organisational structure.

2.3 Our Business and Our Operations

We are a global leader in our markets and in the products and services we provide. To this end, we must master logistical complexities, time sensitivity, safety, and security considerations as well as a large and diversified work force every day.

We do this through three basic interlinked principles, each with its own set of well-defined processes, practices, and initiatives.

➤ **People Development**

Gate Gourmet puts emphasis and effort on training to build up people's capabilities. Our training initiatives offer courses, from lean principles to coaching and mentoring. Our training also includes methods of sharing information across all levels of the operation and blended learning containing an element of 'on the job' training. Included in our compulsory training program is our gategroup employee conduct which includes ethical employee conduct.

➤ **Operational Deployment**

We aim to identify and mitigate potential issues before they occur and to constantly enhance our policies and procedures which ensure that standards are maintained across the globe. Technology is a true enabler in this area as it allows us to gather data directly at work through tablets and smart phones. Gate Gourmet also encourages employee feedback and suggestions for improvement during shift briefings.

➤ **Infrastructure Management**

Gate Gourmet equips its employees with the technology to increase the safety, quality and speed of product delivery, enhance customer and supplier interaction, and improve communication. With our Mobile Data Collector product delivery and top-off data is captured electronically, increasing speed of reconciliation and invoicing and payment, and driving efficiencies.

In Oceania, our primary business is food production and associated logistics. Our main customer base in the past has been the Airline industry, however in recent times we have been able to diversify our operations to include other non-airline based customers. Irrespective of our Customer base our five key functional areas remain the same.

➤ **Food Production and Packaging**

From menu and recipe design to food production and packaging gate gourmet has full production kitchens. We also purchase ready-made meals and meal components that are assembled in our kitchens and prepared for packaging and delivery.

➤ **Food Packaging, and Delivery (Logistics)**

We orchestrate the assembly of meals according to specifications of our customers, pack the meals in the prescribed manner, stage the items for delivery and loading in controlled coolers, and execute delivery in vehicles that are appropriate for the purpose.

➤ **Post-Service Equipment Removal, Washing and Sterilization, Waste Management**

Where requested by the customer we remove equipment from the customers facilities and take them to the kitchen for unloading cleaning, and sanitising. At locations set up for recycling, refuse is sorted appropriately. For international operations, we separate food waste from the general waste stream according to regulations and arrange for biosecurity disposal. Re-usable items such as crockery and cutlery are sent through the dishwashing lines. All equipment is thoroughly washed and sterilized, according to specifications, and then complete equipment safety inspections to check for functionality and integrity.

➤ **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.

➤ **Management and Administration**

Our management and administration functions include Executive Management and Strategy Development, Commercial, Culinary, Human Resources, Operational, Finance, Procurement, Compliance and Facilities Management. We rely on a diverse portfolio of suppliers to support us in delivery of our services.

2.4 Our Supply Chain

Gate Gourmet is responsible for ensuring an average of 10,000 individual items are procured from an average of 294 suppliers, produced and/or packed to our customer requirements and transported to their selected locations.

➤ Our Customers,

Gate Gourmet provides food production and catering services to:

- ❖ Australian and international airlines
- ❖ Non-aviation businesses including retail and food service providers, and state organisations.

➤ Our Suppliers

Gate Gourmet sources various goods and services that contribute to the services we provide. Most of our supplies, by volume, are food items which are predominantly sourced through large distributors based in Australia. We may at times also be requested to source niche products by our customers.

Gate Gourmet purchases ancillary services such as logistics and transportation (including vehicles and hi-lift trucks, cleaning, packaging, electronics, stationery, office furniture, uniforms and capital equipment) used in large scale production kitchens, as well as real estate and banking services.

Gate Gourmet also uses external casual labour in its operations and outsources its security services.

3.0 Risk Profile - Modern Slavery Risk Profile Gate Gourmet(Holdings)

Gate Gourmet Holdings 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 minimize any risk in its supply chains.

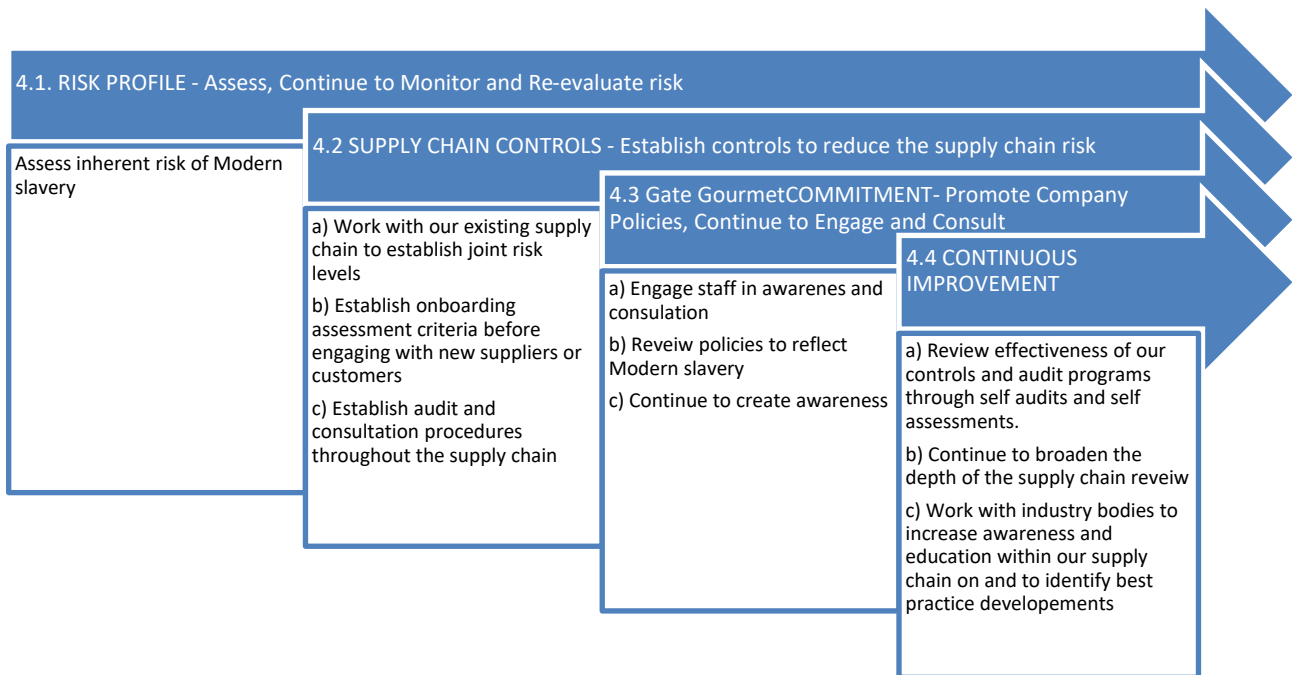
While we remain vigilant, adherence to our corporate policies and procedures support in managing risk of modern slavery in our 1st tier supply chains to a low-level risk. In Oceania we purchase products that meet all relevant Australian and New Zealand Standards and product that are readily available in the market.

Using the criteria of risk defined in the Act, we have assessed our risk under each criterion. These are explained further below.

Gate Gourmet Holdings Risk Profile:

Risks that Gate Gourmet may be <u>DIRECTLY LINKED</u> to modern slavery practices		Risk Level for Gate Gourmet	Risk Management Activity
The risks that Gate Gourmet operations products or services may be connected to modern slavery through the activities of another entity that Gate Gourmet has a business relationship with, including all entities in the supply chain even if Gate Gourmet does not have a contractual relationship	<p>Example</p> <p>If Gate Gourmet uses fish in our meals where that fish is purchased from another entity and that entity sources its fish from a 3rd entity that used forced labour in its fishing industry</p>		
Risks that Gate Gourmet may <u>CONTRIBUTE</u> to modern slavery practices		Risk Management Activity	
The risks that Gate Gourmet operations &/or actions in its supply chains may contribute to modern slavery. Including any acts or omissions that may facilitate or incentivise modern slavery	<p>Example</p> <p>If Gate Gourmet knowingly sets unrealistic cost targets and delivery timeframes for a supplier that can only be met by using exploited labour</p>	<ul style="list-style-type: none"> • Incorporate Modern Slavery into contracts and audit processes • Ongoing consultation with supplier to review their risk management activity as part of monthly/quarterly business reviews • Immediate action to cease activity contributing to the risk. • Ongoing consultation with supplier to review their risk management activity as part of monthly/quarterly business reviews • Implement corporate procedures to remedy. 	
Risks that Gate Gourmet may <u>CAUSE</u> modern slavery practices		Risk Management Activity	
The risks that Gate Gourmet operations may directly result in modern slavery	<p>Example</p> <p>If Gate Gourmet owns and runs a kitchen/operating unit that uses exploited labour</p>	<ul style="list-style-type: none"> • Immediately cease or prevent the risk • Implement corporate procedures to remedy any impact 	

4.0 Managing Risks



4.1 Assessment of Inherent Risk

Risk that Gate Gourmet may CAUSE modern slavery practices. This type of risk is very low. Gate Gourmet has a diligent recruitment process that must comply with our group ethics policy. Notwithstanding our assessment, we remain vigilant and work closely with our external labour hire companies to ensure a thorough due diligence process is undertaken.

Within our business we have identified the operational area, as an area for specific staff development and ongoing monitoring.

Risk that Gate Gourmet may CONTRIBUTE to modern slavery practices. This type of risk has been assessed as low, although we do recognize that some risk may exist. We work closely with our suppliers to ensure that we can deliver best pricing to our customer base. Gate Gourmet does however ensure that we comply with trading that complies with all ethical fair-trading requirements of the Regulations and Act. We conduct regular reviews with our suppliers to ensure that our suppliers are aware that Gate Gourmet will not conduct business with companies engaging in any form of exploited labour.

Risk that Gate Gourmet may be DIRECTLY LINKED to modern slavery practices. This type of risk has been assessed as moderate to high. Considering the products used and our supply base we have identified the following industries used in our business as potentially moderate to high-risk industries based on information from the www.globalslaveryindex.org – prevalence, 2018.

- Electronic products/components
- Casual labour providers
- Fishing industry
- Uniforms and personal protective equipment
- Fruit and vegetables
- Coffee/tea/cocoa
- Packaging

4.2 Supply Chain Controls

We understand that our suppliers and customers 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. To assist in the visibility throughout our supply chain;

- a) We are committed to reducing supply chain complexity so that any vulnerabilities can be more easily identified and addressed.
- b) We have centralised our Procurement, Purchasing, Commercial, Human Resources and Compliance processes to ensure that any onboarding of new suppliers or customers or employees is completed centrally and in accordance with our policies and procedures.
- c) All contracts are reviewed centrally by Group legal prior to execution by Company Directors.
- d) We are committed to working with our customers and suppliers to ensure awareness and processes are in place to manage the risk of unethical sourcing of labour within their business and supply chains. Where feasible, endeavor to replace sourcing from high-risk countries with local and Australian made products with higher transparency on labor hire and employment conditions.
- e) In May 2023, Gate Gourmet sent out a supplier Code of Conduct Acknowledgment to all of our Suppliers endorsed by the Directors, requesting Suppliers to acknowledge the Code of Conduct. The Supplier Code of Conduct as well as the Purchasers Code of Conduct, both of which address Human Rights (and thus Modern Slavery), are now included as a standard Schedule in all Gate Gourmet issued contracts.
- f) Gate Gourmet Holdings continue to receive Gate Group endorsement to ensure that there is a focus on managing the risk of Modern Slavery on a global level. Global training is planned to be implemented and rolled out in the first half of calendar year 2024.

4.3 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 that includes specific modern slavery risk assessment criteria and risk assessment.

We implemented in the last quarter of 2023 an independent cloud-based risk assessment and compliance cloud-based platform which includes specific modern slavery risk assessments for each current supplier, and all new suppliers. The platform is used to classify modern slavery risk and support remediation where risk has been established.

This supports the Procurement and Compliance teams in identifying and mitigating any potential risks identified.

The modern slavery risk assessment takes the form of a 53 question survey to establish to what extent the supplier is able to manage modern slavery risk in the following areas:

- Modern slavery and similar workplace risks within the in the organisation, covering corporate compliance management, audits, employment conditions, child labour and grievance and redress mechanisms – 37 questions
- Supply chain management – 15 questions
- Supplier training and awareness – 1 question

Suppliers are required to include evidence of compliance in support of the answers generated. Modern slavery risk is classified as low, medium or high, based on scores generated from the suppliers responses.

This process ensures compliance with all legal requirements and forms a crucial part of our contracts and business relationships. Where a supplier does not meet the quality and compliance requirements, contracts are not permitted to be issued, or supply is terminated. Any supplier breaches that are discovered after contracting are fully investigated and, where possible, we work with the supplier to remediate the issue flagged. If the breach cannot be remedied, and any leverage available to gategroup has been exhausted, the breach may lead to termination of the supplier.

4.4 Gate Gourmet Commitment

Gate Gourmet must comply with the overall gategroup policies and procedures.

gategroup is a global leader in airline catering and hospitality goods and we provide 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 in our supply chain and our industry.

We are committed to continually monitoring our status as an equal, ethical and diverse employer and have plans set 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.

To support in the delivery of the Gate Gourmet Commitment:

4.4.1 gategroup Policies

gategroup operates several key policies which describe its approach to the identification of and prevention of unethical practices. The organisation has a comprehensive **Code of Conduct** which sets out that the company expects its employees to act honestly, ethically and lawfully.

Specifically, 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

The gategroup Code of Business Conduct, Supplier Code of Business Conduct and Human and Labour Rights Policy can be found here:

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

4.4.2 gategroup Training

➤ **Code of Conduct**

All Gate Gourmet employees have access to the gategroup Code of Conduct upon joining the business. In addition, all employees must undergo corporate training to ensure that they are aware and understand the contents of the Corporate Policies. The training 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, including modern slavery laws.
- ❖ 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.
- ❖ Whistleblower - gategroup maintains an alert-line 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.

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

➤ **Modern slavery awareness**

- ❖ Briefing sessions have been developed for all staff
- ❖ Discussion regarding modern slavery and what each business is doing to manage risk is included on the agenda

for all supplier and customer meetings.

4.5 Continuous Improvement and Next Steps

Supply Chain Awareness and Consultation

- ❖ gategroup works closely with suppliers to improve supply chain standards and is an active member of Suppliers Ethical Data Exchange (SEDEX). As part of gategroup, Gate Gourmet will work within the guidelines of SEDEX to self-audit our process.
- ❖ Gate Gourmet will ensure that all new supplier contracts and renewals contain modern slavery clauses, and we will review modern slavery risk only during the onboarding process but through the life of the contract,
- ❖ Gate Gourmet will work consultatively with the industry bodies to identify and manage the risk of modern slavery in these industries and to identify and communicate best practice opportunities
- ❖ Over the course of 2024, we will have established a comprehensive modern slavery risk and mitigation process in relation to all new and existing suppliers.
- ❖ We continue to work with our suppliers and customers to manage the awareness and implement controls to reduce the risks of Modern slavery in our supply chain for 2nd and 3rd tier suppliers.

4.6 Remediation Process

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

- Where there is suspicion of any risk of modern slavery, we will hold a confidential investigation.
- We will share concerns with our suppliers on a confidential basis and request completion of an internal review
- We will monitor any action and responses to eliminate the risk identified
- We will use any leverage that we have with the supplier or the industry
- Where we are unable to influence the supplier, we will source an alternate supplier, and
- Where appropriate report to the Australian Border Force authorities

5.0 Effectiveness of Controls

Gate Gourmet has established supplier modern slavery assessment reporting and a modern slavery control and a review committee specifically to monitor how effective our controls have been. This will include reporting on:

- Compliance to training
- Compliance to onboarding procedures
- Responses to modern slavery assessments
- Risk profile for all suppliers
- Review of our consultation processes including our supplier business reviews.
- Selected industry/category review in detail
- Review of effectiveness of specific and relevant key performance indicators

6.0 Consultation

In developing Gate Gourmet processes and controls, a thorough consultation process with stakeholders was completed. Our consultation process included stakeholders from Procurement, Human Resources, Legal, Finance, Corporate Affairs, Compliance, Executive Management in Australia and our Singapore Regional headquarters.

While this statement is designed to address specific legislation, Gate Gourmet recognises that modern slavery is a global issue, therefore Gate Gourmet has consulted with all its reporting entities regarding modern slavery. This consultation process will enable us to build a Group wide response to modern slavery as part of our continuous improvement process.

Gate Holdings developed this statement in consultation with, and on behalf of the reporting entities identified in section 2.2 of this Statement. Each entity has agreed to be represented in the modern slavery control and review committee, whose responsibility will be to identify risk, assess the effectiveness of control and raise awareness of modern slavery.

We have consulted with all the entities that this statement is provided for. All entities follow the group guidelines and have agreed to endorse this statement.

While this statement does not include upline reporting entities within the group Structure, as a global entity, we have consulted with Gate Group Holdings management team to ensure that group policies address modern slavery.

7.0 Other Information

7.1 Impact of COVID-19

7.1.1 Impact on Organisational Structure, Entities and Operations

Our largest customer base prior to COVID19 was the airline industry. As part of the travel industry, Gate Gourmet saw a significant decline in demand for airline catering services. Gate Gourmet had to close several operating units including Perth, Darwin, Cairns and the Gold Coast as a result. At that time, during the pandemic and until late 2022, COVID-19 affected our revenue, our operations, and our staffing. The business has since then recovered throughout the year 2023, servicing customers from the reduced operating unit base footprint.

7.1.2 Impact on Risk Profile

To mitigate the impact any future pandemic on our business, Gate Gourmet is constantly looking at opportunities for new business and continue to diversify our portfolio, so that we can continue to support our supply chain and reduce the risk of modern slavery caused by pandemic induced economic circumstances in the industry.

8.0 Board Endorsement

This statement has been formally approved and signed by members of the Executive Team on behalf of:

- Gate Gourmet Services Pty Ltd
- Gate Gourmet Services (NSW) Pty Ltd
- Gate Gourmet Rail Pty Ltd
- Gate Gourmet Cairns Pty Ltd
- Gate Gourmet Riverside

This Modern Slavery Statement has been endorsed by the Gate Gourmet (Holdings) Pty Ltd Board.

Todd Steele
Managing Director, Gate Gourmet, Oceania

Tania Trifunoski
Financial Director, Gate Gourmet, Oceania

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