

## Fighting Against Forced Labour & Child Labour in Supply Chains Report

2023 Annual Report

## 1. Introduction

This report is made by Gate Gourmet Canada, Inc. (“**Gate Gourmet**”), a Canadian private corporation, for the financial reporting year ending December 31, 2023, in compliance with Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

As required by the Act, this report summarizes the steps Gate Gourmet has taken in the reporting year listed above to prevent and reduce the risk that forced labour and child labour are used in our operations and supply chain.

## 2. Our Business

Gate Gourmet is a leading provider of airline catering and retail-on-board services at eight (8) major Canadian airports: Toronto Pearson International Airport, Vancouver International Airport, Calgary International Airport, Edmonton International Airport, Ottawa International Airport, Winnipeg Richardson International Airport, Halifax Stanfield International Airport, and Regina International Airport.

We prepare/procure in-flight meals at our operating units located at the above-mentioned Canadian airports, and we load these meals onto our customers’ aircraft. We also provide technology and administration services for the on-board sale of food products.

Gate Gourmet is headquartered in Mississauga, Ontario. Across Canada, we have approximately 2000 employees. Gate Gourmet is a subsidiary of gategroup, with global presence in over sixty (60) countries, headquartered in Zurich, Switzerland.

Gate Gourmet is committed to respecting and promoting human rights and safe working conditions of our employees and those impacted by our supply chain. Gate Gourmet strives to work with suppliers who share and enforce our vision for corporate social responsibility.

## 3. Supply Chain

Gate Gourmet’s primary vendors supply us with food, beverages, and raw ingredients. Other important vendors supply us with the following goods and services: foodware, waste removal services, fuel, ice, truck repair services, cleaning supplies, uniforms and related services, plumbing and mechanical services, and labels.

Most of our direct suppliers are located in Canada, in close proximity to our operations.

## 4. Supply Chain Risks

Gate Gourmet has considered the ways in which our activities and supply chain could potentially cause, contribute to, or be linked to the risk of forced labour and child labour.

We believe that the risk of forced labour and child labour in our own operation is minimal. We recruit domestically, and our recruitment processes are compliant with applicable laws and best industry practices, as described below. The vast majority of our workers are employed directly through Gate Gourmet. Further, we recognize our employees' right to freedom of association. Each of our eight (8) operating units are unionized and we comply with working conditions negotiated by union groups on behalf of our bargaining units.

Our view is that the risk of forced labour and child labour is also low with respect to our direct suppliers. We have contractual protections in place with our direct suppliers, requiring compliance with applicable laws, including human rights laws, as described below.

Where Gate Gourmet is the downstream purchaser in a supply chain, we acknowledge that the risk of forced labour and child labour may be higher. We have less visibility into contractual protections that our direct suppliers impose on downstream suppliers related to human rights. Further, depending on the production location of downstream suppliers, human rights laws and rule of law considerations are relevant.

## **5. Management of Supply Chain Risk**

Gate Gourmet has implemented the following policies and due diligence measures to assess and manage the above-noted risks of forced labour and child labour in our operation and supply chain.

### **a. Policies**

#### **i. Employee Code of Conduct**

Our Code of Conduct applies to all employees, officers, directors, and anyone else operating on behalf of Gate Gourmet. It establishes our mandate to conduct business in an honest, ethical, and lawful manner. The Code of Conduct also focuses on playing our part in the community as responsible, corporate citizens. We have implemented specific policies on achieving this mandate, as described below.

#### **ii. Labour and Human Rights Policy**

Our Labour and Human Rights Policy applies to all employees of Gate Gourmet. It states Gate Gourmet's position on this topic unequivocally – we do not tolerate human trafficking, forced labour, child labour, or child exploitation anywhere within our operation or supply chains.

Further, the Policy affirms our respect for freedom of association and the right to collective bargaining. More specifically, Gate Gourmet respects the rights of our workers to engage in lawful activities related to forming, joining, and assisting a worker's organization. We agree to negotiate with legally constituted employee organizations in good faith.

### iii. Supplier Code of Conduct

The Supplier Code of Conduct applies to all suppliers, their employees and subcontractors providing products, materials, expertise, and related services to Gate Gourmet. It requires suppliers to comply with all applicable laws, and strive to meet elevated social, human and employment standards.

Notably, the Code of Conduct requires suppliers to uphold human rights of workers, which includes refraining from using forced, bonded or prison labour. All forms of slavery are expressly prohibited, including slave-like practices, servitude, or other forms of domination or oppression in the workplace, such as economic or sexual exploitation and humiliation.

The Code of Conduct also requires suppliers to respect and adhere to prohibitions on child labour under locally applicable laws and international conventions.

Furthermore, Suppliers are required to take the following due diligence measures:

- implement effective processes for managing and documenting forced labour and child labour in the supplier's own operation, and ensure that such processes are implemented along the downstream supply chain;
- implement an anonymous whistleblower system for the supplier's employees to use, which includes the ability to raise human rights issues, and ensure that such a system is in place by downstream suppliers; and
- have the ability to transparently disclose production conditions in the supplier's entire supply chain.

The Supplier Code of Conduct also provides that we reserve the right to check and monitor compliance. Non-compliance will be subject to corrective action proportionate to the severity of the violation, up to and including suspension and termination of the supplier relationship.

### b. Supplier Management System

Gate Gourmet maintains a supplier management system ("**SMS**") which contains critical information on our suppliers. Suppliers are required to complete questionnaires and provide related documentation upon initially doing business with us, and annually thereafter. The questionnaire includes a corporate social responsibility section, in which suppliers are required to:

- provide information on their Code of Conduct and Ethical Sourcing Policy;
- provide information on business practices in place to prevent human trafficking/modern slavery; and
- confirm the supplier and its downstream suppliers have not had any incidents of human trafficking or modern slavery.

### **c. Recruitment Protocol**

Gate Gourmet has a Recruitment Protocol which sets out rules and verification processes that must be followed in hiring new employees. Notably, the Protocol includes minimum hiring age permitted by law and documentation required to verify legal ability to work in Canada.

### **d. Contractual Clauses**

Gate Gourmet has developed standard environmental, social and governance (“**ESG**”) clauses for supplier contracts. The ESG clauses are being included in new supplier contracts, and existing supplier contracts are being updated with the language when otherwise amended.

The ESG clauses require suppliers to, among other things:

- Comply with the Supplier Code of Conduct, inform us of any breach, promptly resolve the breach, and ensure its downstream suppliers meet the same standards as established in the Code;
- Exercise due diligence for human rights as set out in certain corporate due diligence and human rights statutes; and
- Provide us with information requested to assess social risks in the supplier’s supply chain.

The ESG clauses also permit us to audit compliance. In any event, our template contracts contain general language permitting us to audit suppliers, including for compliance with applicable legal requirements.

## **6. Employee Training**

All Gate Gourmet employees receive training on our Code of Conduct as part of the hiring and onboarding process. Gate Gourmet employees in recruiting activity are trained on our Recruitment Protocol. Lastly, all Gate Gourmet employees have access to our Labour and Human Rights Policy, and our Supplier Code of Conduct.

## **7. Assessing Effectiveness**

The following measures assist Gate Gourmet in assessing the effectiveness of the policies and due diligence measures we have implemented to mitigate the risk of forced labour and child labour in our supply chain.

### **a. Audit**

Gate Gourmet has identified instances where third party labour is routinely used in our operations (which are limited). We have begun auditing suppliers of said third party labour pursuant to our contractual rights. The scope of the audits included/will include:

- Review of supplier hiring and compensation practices to confirm compliance with legal requirements (i.e., documentation checks, minimum wage); and
- Validation that workers supplied to Gate Gourmet are legally entitled to work in Canada and are being paid in accordance with legal standards.

#### **b. Whistleblower System**

Gate Gourmet employees play a critical role in our mandate to fight against forced labour and child labour. Employees are urged to raise concerns and report any unethical behaviour and/or policy violations. This can be done anonymously through our independent whistleblower system – Integrity Line – by phone or online report.

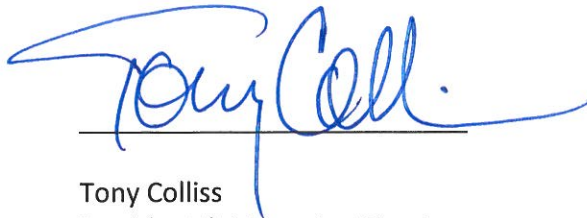
Gate Gourmet takes all reports seriously. We are committed to protecting reporters from discrimination and retaliation.

#### **8. Remediation**

In the reporting year in question, we have not identified any incident (or allegation) of forced labour or child labour in our activities or our supply chain. As such, remedial measures were not necessary.

#### **Attestation**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Tony Colliss  
President & Managing Director  
Gate Gourmet Canada, Inc.  
Date: MAY 30, 2024

*I have authority to bind Gate Gourmet Canada, Inc.*