

Code of Conduct

GATEGROUP'S ETHICAL COMPASS





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 but also 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

intro

CODE OF CONDUCT

- 5 About our Code
- 5 Make Ethical Decisions
- 5 Be Willing to Speak Out
- 5 Violation of the Code

01

WE LIVE BY OUR VALUES

- 6 We Live by our Values

02

WE COMPLY WITH THE LAW

- 7 We Comply with the Law

03

WE TREAT EACH OTHER FAIRLY

- 8 Diversity
- 8 Equal Opportunities
- 8 Health & Safety
- 8 Environment
- 9 Security
- 9 Anti-Harassment / Anti-Discrimination

04

WE RESPECT OUR PROPERTY & INFORMATION

- 10 Confidentiality
- 11 Company Property
- 11 Information Technology
- 11 Employee Privacy
- 11 Intellectual Property
- 11 Communications
- 11 Social Media

05

WE DEAL FAIRLY WITH OUR BUSINESS PARTNERS

- 12 Market Relationships
- 12 Fair Competition
- 12 Gifts & Entertainment
- 12 Anti-Bribery

06

WE ARE A RESPONSIBLE GLOBAL COMPANY

- 13 Accurate Accounting & Internal Controls
- 13 Conflicts of Interest
- 14 Being a Public Company
- 14 Political Activities & Lobbying
- 14 Corporate Social Responsibility ("CSR")



ABOUT OUR CODE

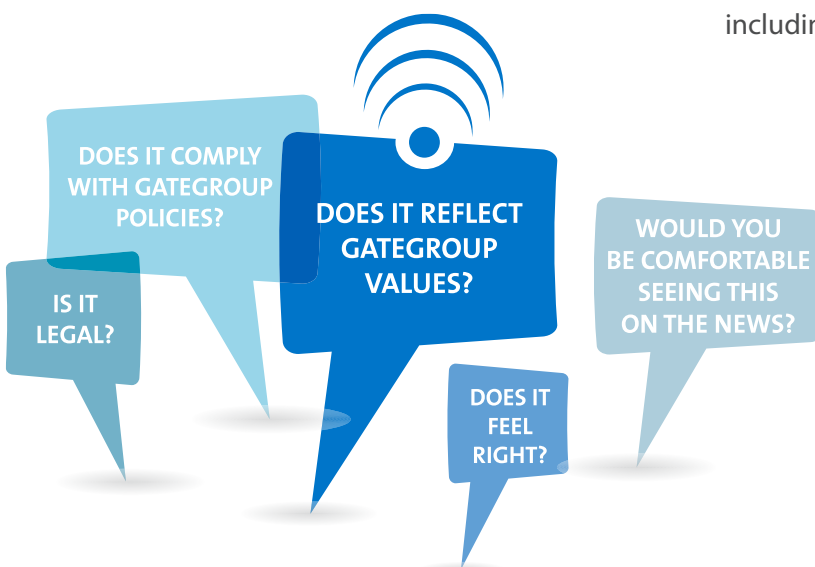
gategroup employees are committed to acting honestly, ethically and lawfully. Our Code of Conduct (the “Code”) provides guidelines for the ethical behavior we expect from one another and what our stakeholders can expect from gategroup.

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.

MAKE ETHICAL DECISIONS

At gategroup, we are committed to acting ethically. Sometimes the correct course of action may not be obvious, so if you are ever uncertain about whether you are doing the right thing, take a moment to ask yourself the following questions.

If you answer NO to any of them, do not move forward with the action and seek advice.



BE WILLING TO SPEAK OUT

We each play an important role in supporting the Code and are encouraged to speak out about our concerns. We raise concerns and report any unethical or inappropriate behavior.

You can raise a concern by using any of the following ways:

- Speak with your immediate supervisor or your HR representative
- Contact a member of gategroup’s Legal team
- Contact the SpeakUp Line (gategroup’s confidential independent whistleblower service) via <https://speakupline.gategroup.com>, gategroup’s Intranet, or telephone (posted locally)
- Email codequestions@gategroup.com

gategroup takes every report seriously. We investigate thoroughly, fairly and confidentially, and take action as necessary and appropriate.

We protect those who communicate honest concerns from discrimination or retaliation.

VIOLATION OF THE CODE

We believe in compliance with our Code. Violations of the Code may lead to disciplinary action up to and including termination.

We live by our Values

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.



We comply with the law



As a global company, we comply with both local and international laws, which can range from food safety to anti-corruption to insider trading. gategroup has a number of policies to assist us in understanding our obligations and ensuring compliance with the law.

We each have a personal responsibility to understand and comply with all applicable laws, rules, regulations and company policies as we perform our daily responsibilities. If we are unsure about our obligations, we seek advice.

remember

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.

We treat each other fairly



DIVERSITY

We delight in our diversity. Our global community includes people of all races, colors, ethnicities, ages, genders, nationalities, marital status, sexual orientation, gender identity, religions, disabilities, military status and cultures. Our diversity sparks new ideas, thoughts and creative solutions. It reflects the global community in which we work.

EQUAL OPPORTUNITY

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.

HEALTH & SAFETY

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.

ENVIRONMENT

Our environment is also an important component of our workplace. Every day, we make efforts to recycle, reduce emissions and decrease waste resulting from our products and processes. Your individual contributions make a significant difference in minimizing gategroup's impact on the environment.

for more information

Look in your regional health and safety policies and procedures.

SECURITY

We all deserve to work in an environment free of fear, threats and physical harm. That is why it is important for us to follow proper security protocol. Whether it is denying access to an unauthorized individual in a secure area or reporting any suspected criminal or threatening activity, you play a critical role in making gategroup a safe and secure place to work.

ANTI-HARASSMENT/ANTI-DISCRIMINATION

We are committed to a workplace that is free from sexual, racial, religious or other unlawful harassment or discrimination, whether verbal, physical or otherwise. We have a zero tolerance policy against discrimination or harassment.

We treat everyone with respect and do not subject anyone to unwelcome advances, requests for sexual favors or other conduct that could reasonably offend another person. It does not matter if such conduct was intended to offend or not.

We don't tolerate the possession, use or distribution of pornographic, racist, sexist or otherwise offensive materials.

We are responsible for maintaining a harassment-free workplace, and reporting anything of concern. By treating each other with dignity and respect, we create a workplace that we look forward to coming to every day.

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

don't forget

You may have local Anti-Discrimination and Anti-Harassment policies and should refer to them for more information.

We respect our property and information



CONFIDENTIALITY

gategroup's confidential information is a valuable asset that is very important to our success.

Confidential Information is non-public business information learned as an employee, officer or director of the Company, including:

- Sales and profits figures, pricing, strategic plans, new products, research and 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 and other intellectual property
- Lawsuits and other legal proceedings
- Fellow employee or customer personal information

We are all responsible for protecting gategroup's confidential information, unless disclosure is necessary to comply with court orders or government investigations.

We take reasonable physical and electronic measures to safeguard gategroup's confidential information, and share confidential information only with proper authorization for legitimate business purposes.

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. Your confidentiality obligations to gategroup continue after you leave the Company.

COMPANY PROPERTY

Each of us is responsible for protecting gategroup property. We use Company property for business purposes, and not for personal activities. You can help gategroup protect its property by watching out for theft and fraud, and by reporting suspicious activity.

INFORMATION TECHNOLOGY

Secure information technology resources are essential to gategroup's business operations. We have a responsibility to use these resources appropriately and protect them against damage.

Information technology resources include all computers, wireless devices, mobile/smart phones, internet and intranet access, networking infrastructure and software programs. For further information, please consult gategroup's IT Acceptable Use Policy.

EMPLOYEE PRIVACY

gategroup is strongly committed to safeguarding the privacy of our employees. While personal information may be collected to enable effective business operations or to meet legal requirements, we always take care to properly secure personal information. We use it only for legitimate business needs and in accordance with applicable laws.

INTELLECTUAL PROPERTY

We value our intellectual property. gategroup's trademarks, copyrights, designs, brands, software, trade secrets and patents are important assets that we all must protect.

COMMUNICATIONS

We are committed to communicating with the public in an honest, open and consistent voice. All media inquiries must be forwarded to gategroup's Corporate Communications team.

All communications with investors and financial analysts must be directed to the Investor Relations team. Authorization from the Head of Corporate Communications or Chief Legal Officer is required when speaking on behalf of the Company.

SOCIAL MEDIA

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 comply with gategroup's Social Media Policy.

what is gategroup property?

Examples of our property include, but are not limited to, products, inventory, money, supplies, equipment, vehicles and buildings.

We deal fairly with our business partners



MARKET RELATIONSHIPS

We deal fairly with our suppliers, customers, and competitors and never take advantage of our market relationships through manipulation, deception, misrepresentation or any other unfair-dealing practice.

gategroup protects the confidentiality and privacy of our suppliers and customers. We strive to produce advertisements and marketing materials that are fair, accurate and lawful.

FAIR COMPETITION

We believe that free and open competition ensures high quality and innovative products and services. Avoid improper actions that restrict competition, including discussing with a competitor about prices, costs, production or customers. Competition laws — also known as antitrust laws — are complex. Determining what actions unreasonably restrain business or are improper will vary.

Whenever you have questions about any communication, arrangement or transaction, please contact gategroup's Legal team.

GIFTS & ENTERTAINMENT

We are committed to securing and retaining business on the excellence and integrity of our products and services. You should never give, solicit or accept any gift or entertainment in exchange for gategroup business or an obligation to do something in return.

Consult

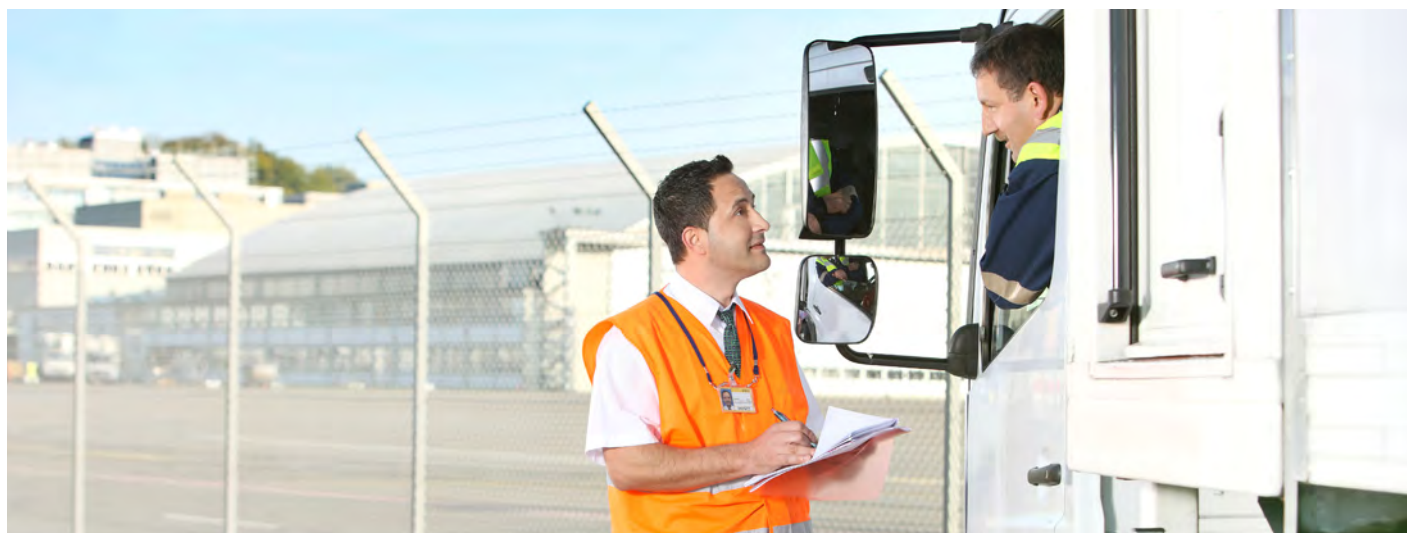
gategroup's Gifts, Entertainment and Charitable Contributions Policy for more detailed information

ANTI-BRIBERY

We believe in doing business with integrity. Bribery harms our Company, customer relationships and communities. gategroup complies with all applicable anti-bribery laws of the countries where we do business.

Avoid giving and receiving anything of value (such as cash, a job, stock or gifts) to obtain or retain business or seek favorable treatment. For additional information, please consult gategroup's Anti-Corruption Policy.

We are a responsible global company



ACCURATE ACCOUNTING & INTERNAL CONTROLS

We fully and fairly disclose the financial condition of gategroup in compliance with applicable accounting principles, laws, rules and regulations. We comply with gategroup's system of internal controls.

Investors, ratings agencies, creditors, government agencies and other organizations rely on the disclosures we make about the financial condition of gategroup. As a company, we also rely on our books and records internally to make responsible business decisions.

Each of us should ensure that the information we record is honest, accurate and clearly understandable.

These principles apply 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.

CONFLICTS OF INTEREST

We avoid personal activities and interests that conflict with the interests of gategroup.

We avoid the following kinds of situations:

- Engaging in personal or business activities that compete with the business activities of gategroup
- Using gategroup confidential information for personal gain
- Holding a financial interest (including shares) in suppliers, customers and competitors of gategroup
- Entering into consulting, managerial or employment-type relationships with customers, suppliers and competitors
- Having members of the same family report to each other
- Asking for or receiving inappropriate gifts or benefits from a customer, supplier or co-worker associated with your position in the Company

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.

GATEGROUP'S PUBLICLY TRADED DEBT FACILITY

We are mindful that gategroup has issued financial instruments which is publicly listed on the SIX Swiss Stock Exchange. Our Company's confidential information includes non-public information that is important for investors deciding whether to trade gategroup's financial instruments.

As employees of a public Company, we do not trade gategroup's financial instruments based on insider information. Neither do we engage in tipping, which involves passing inside information to others so that they can trade gategroup's financial instruments.

POLITICAL PROCESS & LOBBYING

We respect the rights of our employees to participate independently in the political process. However, we are careful to make others aware that any political views or actions we take as individuals are personal to ourselves and are not those of gategroup.

To ensure that gategroup acts as a responsible corporate citizen and complies with the law, we always obtain the approval of the Legal team before making political contributions on behalf of the Company.

CORPORATE SOCIAL RESPONSIBILITY (CSR)

We strive to operate in a socially, environmentally and economically sustainable way.

We are committed to operating in an ethical manner, treating our employees and suppliers fairly, managing and minimizing our environmental impact and playing our part in the community as a responsible corporate citizen.

Our CSR platform is focused on four areas relevant to our business activities and that reflect our core values:



We are determined to strengthen our commitment and to further advance our CSR activities. Each of us has a role to play and should all seek new ways of growing our commitment to CSR.

take a look at this!

If you have access to insider information, or you are involved in making strategic or managerial decisions for gategroup, you are responsible for ensuring you read and understand the gategroup Securities Trading Policy.

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gategroup

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