



# Emirates Flight Catering

THIRD PARTY CODE  
OF CONDUCT



# CONTENTS

**3 A MESSAGE FROM THE  
CEO****4 VISION, MISSION****5 PURPOSE OF THIS  
THIRD PARTY CODE OF  
CONDUCT****6 WORKING TOGETHER****7 PRINCIPLES****8 ETHICS AND  
COMPLIANCE IN  
BUSINESS**

- 9 All Our Third Parties Must Comply with Laws and Regulations
- 10 Conflict of Interest
- 11 Confidentiality
- 12 Data Privacy and Information Protection
- 13 Anti-Bribery and Anti-Corruption
- 14 Gifts and Hospitality
- 15 Accuracy of Business Records
- 16 Fair Competition and Antitrust
- 17 Compliance with Sanctions
- 18 Internal Controls

**19 ETHICS AND  
COMPLIANCE IN THE  
WORKPLACE**

- 20 Diversity and Inclusion
- 21 Anti-Harassment and Anti-Violence
- 22 Human Rights
- 23 Health and Safety

**24 ETHICS AND  
COMPLIANCE IN  
SOCIETY**

- 25 Environment and Sustainability

**26 PROMOTING AWARENESS****27 SPEAKING UP****28 FOLLOW US ON OUR  
SOCIAL MEDIA**



## A MESSAGE FROM THE CEO

At Emirates Flight Catering, we take pride in being industry leaders, supported by a dedicated team of over 13,000 employees and a broad network of third-party collaborators.

Our Third-Party Code of Conduct is designed to ensure that actions and communications align with our objectives. It mirrors the principles of our internal Code of Conduct, emphasising our commitment to partnering with collaborators who demonstrate expertise, integrity, and reliability.

This document serves as a guide, outlining the core values and ethical standards that drive our operations. Our aim is not just to meet legal requirements but to consistently go beyond them.

We highly value our relationships with third parties and strive for transparency and mutual respect. In return, we expect our collaborators to understand and uphold the standards outlined in this Code of Conduct.

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**Shahreyar Nawabi**  
CEO





## VISION, MISSION

### VISION

To be the most admired and innovative culinary solutions provider

### MISSION

We are committed to making a positive, sustainable impact through our superior quality, elevated services, exceptional people and state-of-the-art technology in gastronomy





## PURPOSE OF THIS THIRD PARTY CODE OF CONDUCT

The purpose of this Third-Party Code of Conduct (the "Code") is to detail the ethical values, business principles and expectations that Emirates Flight Catering Company LLC ("EKFC") has for all its third parties. Third party refers to any individual or entity with whom EKFC has or plans to enter a business relationship. A third party may include, but is not limited to, persons or entities that provide goods or services to EKFC and/or procure goods or services from EKFC (e.g. customers, business partners, contractors, external consultants, suppliers, vendors, brokers, advisers).

This Code aligns with our internal Code of Conduct and should ensure that our standards of behaviour and expectations are extended throughout our supply chain.

While we appreciate that our third parties may have their own code of conduct, we request that the principles detailed in this document are considered and agreed to, as we build our relationship together to provide a high-quality service that is delivered with integrity, transparency and in compliance with legal and ethical requirements.

This Code is applicable to all third parties of EKFC and will be stipulated as part of our contractual business relationship.





## WORKING TOGETHER

EKFC is committed to the highest standards of ethics, values, transparency, integrity, and social responsibility, and EKFC expects all its third parties engaged in any kind of business relationship with EKFC to have, or to make, a similar commitment. This Code describes EKFC's expectations for how its third parties conduct business. EKFC requires all its third parties to act in accordance with the highest standards of ethics, integrity, this Code and with all applicable laws and regulations within the geographies in which they operate, and to be open and cooperative with regulators that enforce such laws. Third parties must impose substantially similar obligations to those set forth herein on their own third parties.

Our Code addresses our ethics and compliance responsibilities in our business, workplace, and our society to guide our third parties to operate and perform in the right way. We expect from our third parties to use all these important principles to guide their decisions as they do business. They enable us to achieve mutual success in the right way.





## PRINCIPLES

The Code reflects EKFC's values and sets forth what is required and expected of its third parties with respect to the following commitments:

### 1. Ethics and Compliance in the Business

- All Our Third Parties Must Comply with Laws and Regulations
- Conflict of Interest
- Confidentiality
- Data Privacy and Information Protection
- Anti-Bribery & Anti-Corruption
- Gifts and Hospitality
- Accuracy of Business Records
- Fair Competition and Antitrust
- Compliance with Sanctions
- Internal Controls

### 2. Ethics and Compliance in the Workplace

- Diversity and Inclusion
- Anti-harassment and Anti-Violence
- Human Rights
- Health and Safety

### 3. Ethics and Compliance in Society

- Environment and Sustainability

It is important to us that all our third parties exhibit high ethical standards and principles, in adherence to this Code, which was created so that we can share our core values and principles.







CONTENTS

A MESSAGE  
FROM THE CEO

VISION,  
MISSION

PURPOSE OF THIS  
THIRD PARTY CODE  
OF CONDUCT

WORKING  
TOGETHER

PRINCIPLES

ETHICS AND  
COMPLIANCE  
IN BUSINESS

ETHICS AND  
COMPLIANCE IN  
THE WORKPLACE

ETHICS AND  
COMPLIANCE  
IN SOCIETY

PROMOTING  
AWARENESS

SPEAKING  
UP



# ETHICS AND COMPLIANCE IN BUSINESS

All Our Third Parties Must Comply with Laws and Regulations

Conflict of Interest

Confidentiality

Data Privacy and Information Protection

Anti-Bribery & Anti-Corruption

Gifts and Hospitality

Accuracy of Business Records

Fair Competition and Antitrust

Compliance with Sanctions

Internal Controls





## ALL OUR THIRD PARTIES MUST COMPLY WITH LAWS AND REGULATIONS

All our third parties are responsible for ensuring that they are in compliance with all applicable laws and regulations, and for understanding and complying with this Code as well as other applicable EKFC policies.

### We expect our third parties to:

- Know and follow global and local laws that apply to them and their business,
- Comply with or outperform all applicable regulations (business, financial, environmental, social, quality & food safety, and health & safety) relative to their business,
- Treat business ethics and legal requirements as a minimum standard,
- Alert EKFC to any material issue with the business relationship (such as, goods and services they supply),
- Fulfil all their contractual commitments to EKFC in compliance with highest level of transparency and business ethics.





## CONFLICT OF INTEREST

As EKFC, we are known and trusted for always doing business with the utmost ethics and integrity. All our third parties must avoid situations where personal interests, such as family or financial interests, conflict with those of EKFC (or may be perceived as such). Any actual, potential or perceived conflict of interest must be reported to EKFC to ensure it is managed appropriately.

EKFC expects from all its third parties to disclose any actual or potential conflicts of interest as soon as they become aware of them, so that these conflicts can be properly addressed and managed. Having a conflict of interest is not a violation of our Code; a violation only occurs when the conflict is not disclosed and addressed.





## CONFIDENTIALITY

We expect EKFC's plans and information to be treated as confidential, and not to be disclosed to people outside our organisation unless it is necessary, properly authorised, and appropriate steps have been taken to secure the data.

Third parties must appropriately manage and protect any confidential information, trade secrets, and/or intellectual property belonging to EKFC or any EKFC third parties which is shared with them to ensure that confidentiality is maintained and that such information is not disclosed. It is strictly prohibited for our third parties to use any information disclosed by EKFC for any purpose other than the fulfilment of the contractual business relationship.

Third parties must notify EKFC as soon as practicable if there has been any authorised disclosure, loss, or compromise of any such confidential information belonging to EKFC or any EKFC business partner and use best efforts to mitigate any potential risks relating to the breach.







## DATA PRIVACY AND INFORMATION PROTECTION

Third parties must take adequate measures to ensure sufficient protection of any personal data received from EKFC and the rights of privacy of its employees and their personal data. Third parties must comply with all applicable local and international laws and regulations related to data protection, privacy, and/or processing of data and information. Third parties must not cause EKFC to be in violation of any such laws and regulations.

Any third-party processing personal data on behalf of EKFC agrees to process such personal data pursuant to any data processing requirements that EKFC provides to third party in contract provisions or otherwise in writing. Third parties must notify EKFC as soon as it becomes aware of any unauthorised access, theft, loss, misuse, or damage, or any other breach of security, in relation to any EKFC data or information in the possession of (or processed by or at the direction of) suppliers, its agents, or subcontractors.



## ANTI-BRIBERY AND ANTI-CORRUPTION

We do not offer, promise, give, request, agree to receive, or accept bribes no matter what the value or local business practice may be. This applies to all business partners with whom we deal. We also expect business partners acting for or on behalf of EKFC not to give or receive bribes or to make improper payments.

We do not make facilitation payments or allow other people to do so on our behalf.

Third parties must act in full compliance with the any applicable local and international laws and regulations on anti-bribery and anti-corruption, including but not limited to the U.S. Foreign Corrupt Practices Act, and the U.K. Bribery Act. All our third parties must comply with third party risk management process as instructed by EKFC from time to time. This process may require third parties to declare any business or ownership ties to a government official or entity, representatives of a political party, or an EKFC employee, prior to conducting business with EKFC, or other relevant information requested by EKFC.

We do not make political donations or engage in coercive practices, such as threats or blackmail. We expect our third parties to report to EKFC all instances of suspected or actual bribery, fraud, or other breaches of EKFC's ethical practices, in relation to their business activities with EKFC (see EKFC Speak up channel – Your Voice on the final page of this Code).





## GIFTS AND HOSPITALITY

We ensure that any gifts or hospitality we give or receive are always clearly for business purposes and are reasonable and appropriate. Third parties are not expected to offer any gifts, hospitality or entertainment to any employee or representative of EKFC. Offers that are reasonable and proportionate to the relationship may be accepted if they are in compliance with EKFC's internal Gifts and Hospitality Policy, but in any case, these offers must never be made or perceived with the intent to influence business decisions or behaviour.





## ACCURACY OF BUSINESS RECORDS

We maintain records that fairly and accurately reflect our business transactions as they occur, and we do not knowingly provide false information. Third parties must record and maintain all commercial and business transactions completely, transparently, accurately, and in a timely manner. Third parties must never falsify, omit, misstate, or conceal any information on their business records. Books and records must be kept in accordance with all applicable laws and regulations, as well as generally accepted accounting principles.





## FAIR COMPETITION AND ANTITRUST

We do not engage in anti-competitive practices, such as price fixing, bid-rigging, or collusion with our competitors. Third parties are expected to conduct their business in an honest and transparent manner and must carry out their business with EKFC in compliance with competition laws.

Third parties must not, directly or indirectly, engage in illegal or illicit collaboration with competitors, discuss competition or competitively sensitive information with competitors, or agree to restrain trade or reduce competition. Third parties must comply with all applicable competition or antitrust laws and regulations.



## COMPLIANCE WITH SANCTIONS

We comply with all applicable economic sanctions, export control and anti-boycott laws, regulations, orders, designations, licenses, and relevant directives. Third parties must implement effective internal controls to minimise the risk of breaching these laws and of causing EKFC to violate such laws.







## INTERNAL CONTROLS

Third parties must have the required level of internal control mechanisms to ensure compliance with ethical values, business ethics and applicable laws and regulations. Third parties must periodically conduct objective and independent audits, taking into account the highest level of business ethics, transparency, integrity and honesty.

Third parties must ensure prevention and timely correction of non-compliance and the implementation of improvements as appropriate. In the cases where the third party is the supplier of products and services to EKFC, or acts on behalf of EKFC, EKFC reserves the right to request to audit and inspect third party's operations and facilities. If the results of such an audit or inspection cause EKFC to be of the opinion that the third party does not comply with this Code, the third party shall take necessary corrective actions in a timely manner.





CONTENTS

A MESSAGE  
FROM THE CEO

VISION:  
MISSION

PURPOSE OF THIS  
THIRD PARTY CODE  
OF CONDUCT

WORKING  
TOGETHER

PRINCIPLES

ETHICS AND  
COMPLIANCE  
IN BUSINESS

ETHICS AND  
COMPLIANCE IN  
THE WORKPLACE

ETHICS AND  
COMPLIANCE  
IN SOCIETY

PROMOTING  
AWARENESS

SPEAKING  
UP



# Ethics and Compliance in the Workplace

Diversity and Inclusion  
Anti-Harassment and Anti-Violence  
Human Rights  
Health and Safety





## DIVERSITY AND INCLUSION

Our aim is to keep promoting and supporting equality, diversity, respect, and inclusion as the fundamental principles in all our decisions, actions, and any part of our business. Our third parties must not discriminate, and must promote equal opportunity, in hiring, employment and business practices, on the grounds of criteria such as ethnic origin, colour, religion, gender, age, physical ability, national origin, political affiliation, medical condition or marital status.





## ANTI-HARASSMENT AND ANTI-VIOLENCE

We do not allow or tolerate any form of violence, harassment, bullying, or any kind of disrespectful conduct by anyone, including management, employees, or any third parties of our company. We demand business relationships where everyone is treated with dignity and respect. We expect all our third parties to comply with all applicable laws prohibiting workplace violence, mobbing, bullying and harassment wherever we do business.





## HUMAN RIGHTS

We oppose any form of human rights violations, including but not limited to child labour, modern slavery, human trafficking, forced or compulsory labour, harassment, coercion, the menace of any penalty such as the use of physical punishment, confinement, or threats of violence as a method of discipline or control. All third parties are obliged to respect the rights of all their employees and ensure that they carry out all labour recruitment and employment procedures in a legal and ethical manner.

We:

- Prohibit all forms of abuse, harassment, and discrimination.
- Prohibit trafficking or forced labour.
- Prohibit child labour and underage employment.
- Respect the rights of migrant employees and ensure that they will not be threatened or coerced into accepting employment terms or impact their ability to leave.
- Require that the accommodation facilities provided to employees are clean, safe and structurally maintained and all employees have access to clean water and adequate sanitation facilities.
- Recognise and respect fair, legal, and equitable work time schedules and working conditions such as health and safety, and compensation.
- Require all labour recruitment and employment procedures to be carried out legally and ethically.
- Require all our third parties to strictly adhere to the Universal Declaration of Human Rights adopted by the United Nations.

EKFC holds the right to request for audit and human rights due diligence over its third parties that provides workforce support or supplies products and services to EKFC.



## HEALTH AND SAFETY

We are committed to providing a safe, secure, healthy, and hygienic workplace for everyone in and around our facilities, and we expect all our third parties to show the same level of effort and sensitivity on this matter. All our third parties must comply with all applicable laws, standards and best practices for health and safety. We expect an equally high health and safety standard in the operations of our suppliers, contractors, and business partners.

Our third parties must provide employees with a safe and healthy workplace to prevent accidents and injury. Our third parties must take a proactive approach to health and safety by implementing policies, systems and training designed to prevent accidents, injuries and protect workers' health. They must regularly train employees on emergency planning, responsiveness as well as medical care.







CONTENTS

A MESSAGE  
FROM THE CEO

VISION,  
MISSION

PURPOSE OF THIS  
THIRD PARTY CODE  
OF CONDUCT

WORKING  
TOGETHER

PRINCIPLES

ETHICS AND  
COMPLIANCE  
IN BUSINESS

ETHICS AND  
COMPLIANCE IN  
THE WORKPLACE

ETHICS AND  
COMPLIANCE  
IN SOCIETY

PROMOTING  
AWARENESS

SPEAKING  
UP



# Ethics and Compliance in Society

Environment and Sustainability





## ENVIRONMENT AND SUSTAINABILITY

We are mindful of our impact on the environment and strive to minimise the impact of our operations on our surroundings. Third parties must observe and comply with all applicable environmental laws, including, without limitation, those which relate to obtaining and maintaining required environmental permits, approvals and registrations, as well as complying with applicable operational and reporting requirements; managing and handling recycling procedures; monitoring, controlling, treating and sanitizing air emissions, wastewater and solid wastes. Third parties should seek opportunities that promote sustainability in their internal processes and the efficient use of resources and energy.







## PROMOTING AWARENESS OF EKFC'S THIRD PARTIES CODE OF CONDUCT AMONG OUR PARTNERS

At EKFC, we prioritise making our Code of Conduct easily accessible to all our third parties. This is achieved through making the Code available on our official website and actively distributing it among a wide array of third parties, both in digital and printed forms. It is crucial for us that these third-party partners not only review but also fully understand the Code, as it encapsulates the core principles and values that we expect to be upheld. To further this aim, we might also seek written acknowledgments from our third parties confirming their commitment to comply with the Code.

Please note that noncompliance or breach of this Code of Conduct or any applicable laws and regulations may result in the severance of our relationship with you as well as other legal or regulatory consequences.





## SPEAKING UP


We have zero-tolerance for any unethical behaviour, and there is no place for unethical conduct in any operation and business of EKFC.

If you become aware of matters in relation to your business activities with EKFC which are inconsistent with this Code of Conduct, it is very important that you report them to EKFC.

You should raise your concerns by email with the EKFC Ethics, Compliance and Privacy (ECP) team ([ecp@ekfc.ae](mailto:ecp@ekfc.ae)). The ECP team is independent, and all reports received will be treated in strict confidence. Alternatively, reports of concerns can be submitted on an anonymous and confidential basis to EKFC's ethical reporting hotline – Your voice. Everyone can access Your Voice at [yourvoiceekfc.ethicpoint.com](http://yourvoiceekfc.ethicpoint.com).


It is available 24 hours a day, 7 days a week to allow everyone to report concerns or ask questions, either online or by telephone, including in their national language, completely confidentially.

If any matters in this Code of Conduct are not clear, or you have questions or require further information, please contact the ECP team at the above email address.




*With Your Voice, you have a choice.*


Our Hotline allows employees to confidentially  
ask questions or report concerns without the fear of retaliation




Scan Me



Call Toll-free  
800 01 20144



By Mobile Device  
[ekfcyourvoice.ethicpoint.com](http://ekfcyourvoice.ethicpoint.com)



Report Online at  
[yourvoiceekfc.ethicpoint.com](http://yourvoiceekfc.ethicpoint.com)



## FOLLOW US ON OUR SOCIAL MEDIA



WEBSITE



LINKEDIN



INSTAGRAM



FACEBOOK



YOUTUBE

For any suggestions, queries and concerns, please reach out to EKFC Ethics, Compliance and Privacy team through [ecp@ekfc.ae](mailto:ecp@ekfc.ae).





# Emirates

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# Flight Catering