
United Nations Global Compact Communications on Progress 2017

CEO's STATEMENT

March 28, 2018

To our Stakeholders:

I am pleased to confirm that Gulf Catering Company for General Trade and Contracting, WLL reaffirms its support of the United Nations Global Compact in the areas of Human Rights, Labor, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our continued adherence to the principles of the Global Compact and our achievements in furthering these 10 Principles in our business strategy, work culture and daily operations.

Achievements during the past year include:

- ISO 9001:2015 certification for Abu Dhabi, Dubai, Iraq, France and Uganda
- ISO 14001:2015 certification for Dubai
- ISO 18001:2007 certification for Dubai
- ISO 22000:2005 certification for Abu Dhabi, Abyei, Sudan/Darfur, Dubai, Iraq and the UAE
- HACCP certification by Highfield, UK of 471 Sudanese staff members in Iraq, Sudan/Darfur and Abyei
- Continued "Go Green" Recycling and Tree Planting Program in Africa and Iraq
- "Go Green" Composting and Kitchen Garden in Abyei Sudan to replace imported fruits and vegetables carbon footprint and increase staff quality of life
- Award of the American Society for Safety Engineers HSE Excellence Award 2016 - our 4th GOLD Award
- Award of the American Society for Safety Engineers CSR Excellence Award 2017- 3rd GOLD Award
- Arab Organization for Corporate Social Responsibility - 3rd Award
- TATWEEJ Awarding Body (UAE) Corporate Social Responsibility Award 2016 - our 2nd award
- Emirates Wildlife Society (WWF association) Member 2016 - 2018
- Sponsorship of Team Angel Wolf Dubai - providing 2 custom manufactured running push chair to allow special children to participate in races and marathons with experienced athletes as their teammate

Training local employees in conflict zones has now reached a total of 471 certified HACCP personnel in Darfur and Abyei. By becoming an HABC certified training company - we are able to directly train and administer exams to host nation employees.

Our employees take responsibility for the environments in which we work. Our Sudanese management team played lead roles in the rehabilitation a 900-student girls school in El Fasher, Darfur - making this the third school we have rehabilitated in Sudan.

We proudly present our latest achievement to our stakeholders.

Rashad Sinokrot, CEO



UN GLOBAL COMPACT

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights

Principle 2: Make sure they are not complicit in human rights abuses

Gulf Catering Company adheres to the United Nations Proclaimed International Human Rights. Our Ethics training, business practices and Corporate Social Responsibility Programs support and promote these rights.

Gulf Catering Company personnel are required to participate in Ethics and Compliance e-learning courses through Integrity International. Human Rights are a key component of the first module, Code of Business Ethics. The program is administered by Integrity International and allows us to reach our employees regardless of their physical location. Participation is conducted on an individual basis - and employees must pass an on-line examination to achieve certification. Statistical data is sent to our Human Resources Department on a monthly basis.

In 2017, a total of 140 employees successfully completed Integrity International training modules in Ethics Training inclusive of: EEO and Workplace Conduct for Managers, Preventing Sexual Harassment, Code of Business Ethics, Human Rights, Global Mutual Respect, Combatting Bribery, Antitrust and Insider Trading. Represented were employees from Australia, Dubai, Abu Dhabi, Indonesia, Iraq, Sudan, Uganda and Cyprus. Courses are mandatory and completion is tracked electronically.

We also incorporate UN Global Compact awareness into our new employee orientation programs and annual training plan: using the 10 principles and our communication on progress as the program foundation. Our goal here is to ensure that UNGC is understood and practiced by all employees.

Gulf Catering Company has worked in challenging and remote locations throughout the Middle East, Africa, Australia and Asia since 2003. We currently employ 2,889 employees in 11 countries, representing 61 nationalities.

Many of our employees are from developing countries: representing a challenge in ensuring proper recruitment, hiring, work conditions and accommodation of staff members is adhered to at all levels of our organization.

In our Iraq operations we have 68% local hire employees. This number dropped somewhat since 2015 (75%) as oil companies scaled back projects as a result of the drop in oil prices. Our Sudan operations represent 85 percent local hire. And our project in Abyei, Sudan represents a local employee rate of 70%.

Article 26 of the United Nations Internationally Proclaimed Human Rights forms a key pillar of our Corporate Social Responsibility Program.

As an employer of nearly 500 Darfurian personnel in support of our United Nations food rations contracts, we realize the importance not only of providing wages to our employees, but to ensuring the well-being and future opportunities of their families when we are no longer in Darfur.

Employee buy-in and loyalty are key elements of the safety, security and operational success of our company. By renovating the schools attended by our employee's children, and the children of the entire community, we achieve this objective.

Description

GCC SERVICES site management team and local employees select one school per year to be renovated. Schools are in a terrible state of disrepair following years of conflict. They lack floors, windows, electricity, drinking water, toilet facilities, desks, chairs and blackboards. As a result of refugee influx, schools are over-crowded. Despite this, the most amazing thing is that 700 - 960 students attend each school. We believe that if the communities recognize the importance of education and the children are keen to learn, we have a responsibility to do something.

Each summer, while the schools are closed for the holiday, we set to work. All work is done by our employees and volunteers, local suppliers and tradesmen are directly contracted, and our personnel oversee all payments and work. This ensures that dedicated funds are spent where intended, and that we ensure a multiplier effect for our CSR funds:

- Our local employees take great pride in working for us and in bringing this help to their communities
- Local chiefs are included and able to take credit for the development of the school system
- Local suppliers build desks and chairs, construct walls, install windows, paint the buildings, install electricity, set up drinking water cisterns, and build toilets.

School Opening Day

The school is completed within a 6-8 week period, and children are welcomed back to a new facility by local officials, GCC SERVICES personnel and community members.

Remarkable here is that the community takes such pride in these schools, that the opening ceremony is a major event, with students wearing new uniforms, officials making welcoming speeches and everyone thoroughly enjoying the day.

For GCC's project management team, it is a day of pride. Our team members work long, hard days in Darfur, and the school projects are added duties. Yet this effort is best summed up by our project team thanking us for giving them the opportunity to do something important.

Objectives

Add classrooms to the building
Put in floors
Plaster walls
Add window shutters

Manufacture steel desks and chairs (wood is eaten by termites)
Install blackboards
Install drinking water
Install toilets
Paint the facility
Engage local employees
Build partnership between local employees, communities and our company
Ensure a sustainable contribution to the education of children
Ensure that funds are well-spent

Beneficiaries

700 - 960 students
local businesses and contractors
Teachers, education officials
Tribal leadership and government officials
Our local national employees
The United Nations (GCC is the Contractor)
Community and families of the children
GCC expats who derive a sense of pride in involvement
GCC SERVICES - as loyal communities and employees result in less theft of company assets and enhanced security through community buy-in

Inception

GCC SERVICES began the school renovation program in 2015 as a means of giving back to our employees and their communities. We recognized that giving money was not the answer - but education was.

We began with the 2015 renovation of a 960-student school in El Geneina, Darfur. The program was such a success that we followed with the 903 student boys school in El Fasher in 2016. Our 2017 choice of schools was a 903-student girls school in El Fasher (to ensure that we equally supported the education of girls).

Timeline

Each project is started and completed within a 2-month timeframe

Key Milestones

Each school is a milestone in itself. From beginning to end, we allot no more than 2 months to ensure that work is completed during the school holidays.

Implementing Partners

We self-perform the school renovation projects. This is done with the support and encouragement of the local community. All materials, tradesmen and work is contracted through the local community - further adding an economic injection into the community.

There is no bureaucracy, no middlemen, and no diversion of funds.



Al Fasher Girls School before repairs



El Fasher Girls School after repairs

This was our third school rehabilitation project in Africa, and we are currently assessing schools for our 2018 project.

We are currently evaluating our employee suggestions for a 2018 renovation.

Local Employee Training

In 2017, we continued our local employee training program that has resulted in a total of 471 local employees undergoing HACCP Food Safety training in Arabic: resulting in official certification through Highfield Awarding Body for Compliance in the United Kingdom. The training, testing and certification increase knowledge and provide a tremendous sense of pride for employees who have limited access to education - but now have official certificates from the UK. In 2016 we added three certified instructors to our Iraq program, with a result of 106 employees being trained in 2017.

As a result of the knowledge and skills acquired by our employees, GCC SERVICES went on to prepare our Abyei Sudan food warehouses for ISO 22000 certification. Obtaining certification of our warehouse in Sudan's Abyei region was difficult. TUV Nord of Dubai took the challenge and our Director of QHSE accompanied the auditors to Darfur. We further certified our Khartoum food grade warehouses in 2017.

GCC SERVICES was awarded ISO 22000:2005 (Food Safety Management) certification for our Abyei warehouse in Sudan and for our Khartoum warehouse.

Local employees in Sudan are provided with mini-bus transport to and from their workplace, mid-day meals, water, uniforms, job-related protective equipment and safety shoes. Our corporate position is not simply to adhere to minimum requirements - but to provide the communities in which we are working with employment opportunities, training, certification and skills that ensure their future.

Gulf Catering Company has adapted the Universal Declaration of Human Rights and US Government guidelines on Trafficking in Human Beings (TIPs).

We adhere to and exceed international regulations on Trafficking in Human Beings.

Our contract performance is constantly monitored and inspected by our auditors, clients and audit agencies. Likewise, our supplier audits extend the same surveillance: ensuring that we are not buying from suppliers who abuse human rights.

As a part of our recruitment and employee orientation training, new staff members are informed of their rights in their native language. Contracts defining salary and benefits are issued to each employee. Gulf Catering Company pays all recruitment fees, visa, airfare, travel, lodging and meals for our employees. We also pay all social taxes, provide paid holidays, bereavement leave, sick leave and pay indemnity to departing employees.

Employee orientation includes individual human rights and direct reporting access that is independent of direct line management. Daily training modules cover all aspects of job performance and a Trafficking in Persons (TIPS) module that reinforces employee human rights.

Labor Camps and Lodgings are routinely inspected to ensure that each employee receives a minimum of 55 square feet of personal space, adequate caloric intake, no cost medical care, a free monthly hygiene kit, and free laundry service. Employees are issued 6 complete sets of company uniforms, 2 pairs of safety shoes, winter weather clothing and job-related personal protective equipment (PPE). As required, body armor is provided for employees working in conflict zones such as Iraq.

All employees retain their own passports.

At our employee camps in Darfur and Abyei, employee rooms have beds, desks, refrigerator, TV and in-room bathrooms. All linens and hygiene items are provided by the company. Our laundry is operated onsite. Employee clothing and uniforms are cleaned and pressed at no cost to the employee. Meals are prepared on site in the facility kitchens and provided to employees at no cost.

Working hours are governed by the labor law of the country in which we are operating or our own corporate policy, with the more stringent policy being applied if compliance is unclear. Religious holidays and Ramadan hours are respected. Our camps also feature small mosques or prayers rooms. Midday meals are provided for local employees at no cost.

Employees in Iraq and Sudan are paid in compliance with local labor laws: ensuring that social taxes and allowances are a part of their salary package.

Gulf Catering Company has adapted a no-tolerance policy regarding violations of human rights. From direct line supervisors, to project managers, QHSE and corporate HR: all management personnel are held directly responsible for the welfare of employees. In 2016, there were no complaints alleging discrimination

At our Dubai Headquarters, our CEO chairs a junior employee council meeting. All council members are non-management level and represent every department in the company. A target of 3 key improvement areas (whereby results are 70% positive or less) is taken from the company's independently administered annual survey and serves as the council's objective.

Our 2017 Employee Satisfaction Survey was completed by 96 % of our Dubai staff members. Areas for improvement included communication between departments and a review of salaries and benefits. A review of salaries and benefits was conducted in early 2016 by an independent agency utilizing the Hay Job Evaluation system. This a baseline serves as a benchmark for gender equality and promotes equal pay for equal work.

A locked, CEO Mail Box is prominently placed so that every employee can voice issues, either directly or anonymously.

Additionally, all employees are provided with our parent company HOTLINE access.

Quarterly town hall meetings are conducted as an open forum with the CEO and HQ staff.

Gulf Catering Company is ISO 9001:2015, ISO 22000:2005, ISO 18001:2007 and ISO 14001:2015 certified. Our ISO audit systems ensure proper living and working conditions for our staff and subcontractors.

As transition to the new series of ISO 9001 and 14001 audits, we extended audit criteria to start first with leadership: querying them to ensure that they are aware of and practicing compliance.

UN GLOBAL COMPACT

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 4: The elimination of all forms of forced and compulsory labour

Principle 5: The effective abolition of child labour

Principle 6: The elimination of discrimination in respect of employment and occupation

Gulf Catering Company headquarters and management personnel are required to participate in mandatory Ethics and Compliance Courses through Integrity International. EEO and **Workplace Conduct for Managers** is a key course in the program. Employees participate electronically and are required to pass the course examination - the process of which ensures compliance and provides the foundation of our zero-tolerance policy regarding breach of conduct.

Gulf Catering Company respects and protects the right of employees to freely associate and form collective bargaining groups as allowed by local labor laws in the countries in which we operate. We do not discriminate against employees involved in activities of association or collective bargaining.

While the majority of our work is performed in the Middle East, where labor organizations are not common, we do impose International Labor Organization guidelines within our organization. Such guideline compliance is mandatory through our contracts with governments, international agencies, NGOs and global corporations. Our Sudan employees have collective bargaining rights under local labor law.

Our Sudanese employees have labor councils and benefit from a very comprehensive government allowance system for local employees.

Our Global Employment Policy commits us to not tolerate any inhumane treatment of people working for us, including any form of forced labor, physical punishment or other abuse.

Work contracts clearly define employee entitlements, including salary and its payment date, vacation, indemnity and medical entitlements.

Gulf Catering Company promotes workplace equality and seeks to eliminate all forms of unfair discrimination. Equitable processes for recruitment, promotion and remuneration are in place, which ensure employment and promotion on the basis of job requirements and merit, and which support the establishment of a diverse workforce and ensure that all employees and employment applicants are treated equally irrespective of race, color, sex, sexual orientation, religion or belief, family circumstances, political opinion, age, nationality or disability.

Our Sudan and Abyei teams are key example of workplace equality. While our primary work is comprised of warehousing – an area of work where only local males apply, many female community members are proudly earning wages in administrative and camp support services. Culturally, the women often segregate themselves from the males – but we have trained them together, and the women achieve HACCP certification along with the men. They continue to develop their skills and progress.

Employee training is ongoing: allowing us to identify abilities and to promote from within the organization. It is not uncommon to find that employees who began with the company have risen to supervisory or management roles.

Gulf Catering Company became certified by Highfield Awarding Body for Compliance in the UK to conduct, test and certify HACCP training. In 2017, a total of 8 QHSE Managers were certified Tutors through Highfield Awarding Body for Compliance. This allows a greater reach in training employees in Iraq and Africa – areas where training personnel are scarce. By adding Food Safety HACCP training and certification, we provide important job skills and opportunities to employees in remote areas.

To date we have trained and certified:

- Sudan Darfur - Level 1 Food Safety - 388 employees
- Sudan Abyei - Level 1 Food Safety - 83 employees
- Abu Dhabi - Level 2 Food Safety - 22 employees
- Abu Dhabi - Level 3 Food Safety - 5 employees
- Abu Dhabi - Level 4 Food Safety - 1 employee
- Dubai corporate office - HSE Level 1 - 22 employees
- Dubai corporate office - Level 1 Food Safety - 50 employees
- Dubai corporate office - Level 2 Food Safety - 35 employees
- Iraq - HSE Level 1 - 50 employees
- Iraq - Level 1 Food Safety - 72 employees
- Iraq - Level 2 Food Safety - 34 employees

Gulf Catering Company's focus is on a safe and productive working environment for our employees. QHSE awareness and training are a daily part of our work environment.

Gulf Catering Company includes information on employee rights to associate and bargain in our employee orientation program and on-going training program. Employees elect their own representative to management on location and they receive direct QA/ QC corporate access.

We strongly believe that children belong in school. Gulf Catering Company carefully screens all employees prior to employment. We do not employ personnel under the age of 18, nor do we accept suppliers who employ children. Children are not allowed on site, both for their safety and to remove any doubt about their working.

In countries where the minimum employment age is higher than 18 years of age, we adhere to local laws.

Vendor Selection Process

By implementing ISO 9001 standards, all vendors are vetted prior to engaging in supply contracts. Vetting by our QHSE Team involves plant / facility inspection, verification of company registrations and licenses, ISO certifications, product traceability, and product manufacturing ingredient lists.

A comprehensive food product supplier inspection format has been designed specifically for our United Nations food rations contracts. Our Quality Control team visits all premises of food products of animal origin or key product lines before our procurement team issues purchase orders to a supplier company. Child labor presence is audited by examining employee records and visual observation of supplier factories and warehouses.

We also engage TUV Nord and SGS to conduct audits of manufacturing facilities. Identifying signs of labor abuse is key to our audit process. Employee records are reviewed, and visual inspections of working conditions are conducted to ensure compliance on the part of our suppliers.

In our UAE operations, compliance with government-approved accommodation units is required. Here, the government has stepped in to ensure that each employee has life support at a level in agreement with international standards on human rights. Facilities are continuously inspected by our Quality Assurance auditors and by government auditors. Inspections are frequently unannounced to ensure that a true picture is made.

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UN Global Compact

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges

Principle 8: Undertake initiatives to promote greater environmental responsibility

Principle 9: Encourage the development and diffusion of environmentally friendly technologies

Gulf Catering Company received ISO 14001:2004 certification through Lloyd's Register Quality Assurance on November 12, 2011. In December 2013, we became re-certified in the UAE. We undergo surveillance audits annually.

Gulf Catering Company implemented a 'Go-Green' program in 2011. Although small, we push the reduction of printing and use of paper, and we recycle printer cartridges. Plastic water bottles have been eliminated and replaced by 25-liter water coolers. We started this initiative by providing each employee with a personal thermos. Employees provide their own coffee cups, resulting in the removal of disposable cups.

Our corporate newsletter is now issued quarterly, but its' focus remains on Health, Safety and Environmental topics. Environmental issues have covered Recycling, Reducing Paper Use, Tree-planting and Safety issues. Monthly safety bulletins are issued by our QA Department and QHSE reporting is including in each country's monthly financial operations review.

Our country operations in Iraq, Uganda, Sudan and Abyei have each developed their own environmental programs, from recycling, to tree-planting and water conservation. In Nyala, Darfur and Abyei staff members have focused on planting of trees and kitchen gardens. Compost areas have been created for kitchen waste and the compost is then used to fertilize trees and the gardens.

Abyei Sustainable Kitchen Garden

GCC SERVICES' United Nations food rations contract in Abyei, Sudan was awarded in 2015. Abyei is a demilitarized zone between Sudan and South Sudan. At the start of contract, conditions were harsh for our team: poor accommodation, lack of rest and relaxation amenities and a food supply that was trucked in from the Port of Sudan. Our camp chef lacked fresh herbs, vegetables and fruit. And our staff, who worked long days on duty rotations of 10 weeks in and 3 weeks out of Abyei, were challenged to keep morale up. With only mealtime to look forward to, our corporate team and the project manager came up with a unique solution: if the fresh herbs, vegetables and fruits were not available as desired - they would grow what they needed.

While this sounds as if it is a small 'issue', it reflects the development of a complete environmental eco-system.

Soil was not ideal, and required fertilization. Here the team created a composting area where kitchen waste from fruits and vegetables was placed in a pit and allowed to decompose. This recycling effort eliminated the need to place refuse in a dumpster for disposal, reducing the carbon footprint of waste removal trucks and incinerators, and enriched the soil for future use.

Seeds were needed, so the project manager Hassan Bittar, brought seeds back from Khartoum and Lebanon. Team members now do the same when they go home on R&R.

No pesticides are used and the project is 100% 'green.'

Growing started slowly with fresh herbs, some tomatoes and peppers. As items to be grown are identified by the chef and our employees, they are planted and grown. The GCC SERVICES kitchen garden is now a self-sustaining oasis.



Compost Bin - made from recycled materials



Beans, Peas and Jackfruit tree



Tomatoes



Aubergines



Guava



Lemon Trees



Banana Plant



Cassava Plant



Cassava root (harvested)



Watermelons

GCC SERVICES' Abyei Sudan Kitchen Garden		
Category	Type	Qty - kgs
Vegetables	Cucumber	30
	Okra	45
	Pea / Bean	25
	Drumstick	30
	Aubergine	40
Fruits	Tomato	50
	Guava	20
	Watermelon	130
Greens	Coriander	5
	Lettuce	12

Benefits of this project include:

- DIY attitude and creative thinking
- Tasty fresh & nutritious food
- Absence of pesticides /fertilizers apart from domestic manure provides healthier organic products
- Sense of appreciation on the bounty of team efforts
- Stress relief while working on remote site operations
- Greenery and ample shade
- Working away from home and family, having a communal kitchen garden generates a sense of home as a family activity within the team

Rather than relying on fruits and vegetables commercially grown, trucked, sea-freighted and then again trucked to Abyei - the team now enjoys healthy choices from a peaceful garden - which is not only environmentally sustainable - but also sustains their need for calm in a very rough environment.

Earth Day events take place to commemorate environmental appreciation. Trees were planted in Dubai, Sudan-Darfur, Iraq and Abu Dhabi.

In 2015, we began a relationship with the Emirates Marine Environmental Group (EMEG) a WWF organization that continues. EMEG operates a wildlife sanctuary in the United Arab Emirates. Participation in their environmental cleanup actions is an annual CSR project.

We visit the sanctuary and clean debris from the beaches where the endangered hawk-bill turtle will come to nest. Algae clinging to the mangrove roots is pulled by hand, allowing the mangrove trees to breathe and grow. The algae can be dropped on an oil spill in the sea and it absorbs 3 times its weight oil. Another added benefit in aiding the mangrove growth is that beach soil erosion is reduced.

Our team participated in clearing a portion of the mangrove swamp of transplanted saplings that had not thrived in the environment.



Beach Cleanup in preparation for Hawksbill Turtle nesting Emirates Marine Environmental Group: Ghantoot Sanctuary

Our Construction and Life Support contracts involve both preventative actions and the incorporation of environmentally friendly / recycling initiatives. Examples include the safe processing of waste, fuel overspill basins, recycling of aluminum cans, metals and plastic water bottles, and the use of biodegradable catering materials.

Gulf Catering Company gives priority to ISO 14001 qualified suppliers.

When sourcing materials and supplies we require a Material Data Safety Sheet (MSDS) that we provide to our clients.

Environmental spills or contamination have an immediate reporting requirement. Refueling stations are equipped with spill kits, and fuel storage tanks are enclosed in concrete spill containers capable of holding 110% of the tank contents. Catering Operations feature special cooking oil collection areas and grease traps to prevent soil contamination.

Gulf Catering Company has developed waste management charts that include specific handling for each type of domestic and industrial waste including: batteries, tires, concrete, light bulbs, plastic, aluminum, spent brass, iron, glass, oil soaked clothing and rags, paper, wood, kitchen waste, and chemicals. These charts are distributed to all of our work sites and to our clients.

Employees are furnished with appropriate Personal Protective Equipment such as overalls, gloves, eyeglasses, hearing protection, reflective vests and safety shoes to ensure that anyone coming into contact with Hazardous Materials (HAZMAT) is protected. Training is continuous for both recognizing and responding to environmental incidents.

In 2017 our CEO challenged each senior manager traveling from our Dubai HQ to mission sites to conduct a Safety Inspection as one of their Key Performance Indicators. Senior Managers and Directors were provided with an audit worksheet that included key environmental aspects including oil spills, garbage processing and greening of the sites. Findings are presented at management meetings and follow-up action is monitored. The first year result of this action was very positive, and has become a key performance indicator for all senior managers visiting sites.

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UN Global Compact

Anti - Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Recognizing the difficulties of employees and clients in the Middle East, Asia and Africa to understand international standards and practices, Gulf Catering Company's parent company Agility published a comprehensive Code of Business Ethics and Conduct that apply to all group companies and our external relationships. All headquarters and management personnel are required to completed Integrity International on-line, interactive training modules in:

- Government Procurement (rules and restrictions for contractors involved in government procurement processes)
- Code of Business Ethics
- FCPA Anti-Bribery (Foreign Corrupt Practices Act)
- Combating Bribery in Business (bribery, gifts, entertainment, etc)
- UK and EU Competition Law
- Antitrust
- Insider Trading - added in 2017
- EEO and Workplace Conduct for Managers
- Privacy and Data Protection
- UK and EU Competition Law
- Preventing Sexual Harassment
- Global Mutual Respect
- Conflicts of Interest - added in 2017

The training is conducted on-line using examples and situational analysis designed to develop understanding and model behavior. Participants must complete an imbedded examination designed to ensure understanding of good business practices. Course participation is mandatory. An electronic transcript of completion and certificate are generated for employee and corporate records.

The new Anti-trust module focuses on advanced relationships in the business environment. In many cases, we had never thought of situations where our suppliers became our competitors, but in our current environment, with very large contracts at hand, but fewer contracts due to the oil crisis, this is becoming a very real business situation. We now explore the business activities of the companies who have previously been only our supplier.

A key example of this changed business environment manifested itself in late 2016 when an approved, and prominent industry supplier in the UAE was found to be adulterating food supplies with rice and maize powder to increase profits. Our company reacted by undertaking DNA sampling and then providing the results to the Ministry of Health to ensure that the company would provide no future products in the market.

To ensure that we equip our team members with more advanced business skills in the detection of food adulteration, we have organized a training module by

EUROFINS Laboratory in Germany to impart observational skills in detecting food adulteration and a more concise understanding of the use of DNA testing.

Our corporate Code of Business Ethics and Conduct mirrors the UN Global Compact and specifically addresses Employee conflicts of interest, gifts, meals and entertainment in the course of interacting with clients, suppliers, subcontractors and competitors. Our work in emerging or conflict nations requires an understanding of how employees are to conduct themselves - knowing full well that such situations will arise.

The document further addresses business with third parties and anti-trust compliance including:

- Conducting Business with Suppliers, Vendors, Jobbers, Agents, Consultants, and Customers
- Conducting Business with Governments
- Antitrust Compliance
- Agreements among Competitors
- Monopolization

A new revision was issued in 2015 - followed by extensive employee training. The updates include:

- Updated Corporate Alert Line numbers and contact information to report suspected violations
- Adjustments to the Gifts, Meals and Entertainment section highlighting the difference between acceptable hospitality and acts that can be considered bribes in different countries where we operate
- A revised anti-corruption section that reflects more stringent standards that were set by a number of anti-corruption laws, including some with broad-ranging extraterritorial reach. The revised anti-corruption section reflects what is "as a minimum" acceptable to our global customers as well as an increasing number of local customers.
- Our Corporate obligations towards unilateral and multilateral trade sanctions and our commitment to respect them while conducting our business

Employee orientation and training covers real life situations encountered by employees and provides explanatory responses that demonstrate compliance with corporate policy. A series of 'What would you do if.....' scenarios provide guidance.

Gulf Catering Company has a zero tolerance anti-corruption policy. The first page of our corporate Code of Business Ethics and Conduct clearly specifies a hotline number for clarifications, employee concerns and reporting. All communications are considered privileged to ensure employee trust.

Gulf Catering Company and our parent company Agility Logistics are dedicated to our Code of Business Ethics and Conduct. We staunchly defend our record of performance and strive to ensure international compliance at corporate levels.

Our audit processes include internal and external audits. External audits include ISO 9001 compliance and Ernst & Young third-party financial audits.
