

## Policy: **Procurement**

Reference Code: 8/OPS1

Date of Issue: July 2010

Date of Last Update: May 2018

### Scope

The procurement of all goods, services and works for Gatwick Airport Limited (GAL) from third party suppliers.

This policy is not meant to provide detailed explanation of how these activities are carried out. These protocols are available from the procurement department.

### Policy

The overall procurement strategy is align to GAL's overall Corporate Strategy and Values.

We achieve this through a professional and ethical approach by:

- Clear engagement to ensure business requirements are achieved.
- Legislative compliance with appropriate laws, regulations, corporate policies, and Corporate Governance including Bribery and Modern Slavery Acts.
- An approach, which is fair, balanced, proportional and transparent and which considers the whole life cost.
- Procuring the right quality of goods & services at the right time with suitably qualified suppliers.
- Benchmarking regularly to ensure prices are competitive.
- A commitment to developing and improving long term supplier relationships.
- Promoting innovation and efficient use of resources.
- Ensuring the security, health and safety of everyone on the airport.
- Promoting sustainability and protection of the environment through our activity.
- Supporting Gatwick's *Decade of Change* targets through selection of strategic suppliers to provide a responsible and sustainable airport.
- Managing risk proactively and appropriately.

## Monitoring and Assurance

Gatwick's Procurement team shall use the most up to date contract precedents, containing provisions which requires suppliers to comply with Gatwick's Corporate Governance, strategy, Bribery and Modern Slavery Act, Data Privacy Laws and other applicable legislative requirements.

When procuring services which include the processing of personal data by the supplier (as Data Processor) on behalf of Gatwick as Data Controller, then the Procurement Team shall take advice from Gatwick's DPO in respect of the risk assessment process and Legal advice in respect of the applicability of Data Privacy Laws from Gatwick's Legal Department.

A breach or abuse of this policy may result in disciplinary action and/or legal implications.

Compliance with the procure-to-pay and procurement processes shall be monitored with non-compliance being reported to the GAL Executive Team.

## GAL Governance

<b>Executive Management Owner</b>	Chief Operating Officer
<b>Key Contact</b>	Head of Procurement
<b>Legal Matters</b>	General Counsel
<b>Date of First Issue</b>	July 2010
<b>Date of Last Update</b>	May 2018 (GDPR Privacy Requirements)
<b>Date of Last Review</b>	May 2018 (GDPR Privacy Requirements)