



CODE OF CONDUCT

Policy description

This policy outlines the standards of business conduct expected from all our People

Policy owner

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SITA



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FOREWORD BY OUR CEO



Dear Colleagues,

SITA is renowned throughout the global air transport industry. We are a respected company with a strong brand and reputation. With a global community mission, we have member shareholders in every corner of the globe.

Across the world, integrity and reputable business conduct are vital. They are subject to scrutiny from stakeholders, regulators and the media – wherever we operate. For these reasons, it is crucial that each one of us at SITA fully understand the principles of our Code of Conduct and know how to raise any concerns and to ask questions.

Reputations can be lost quickly, so we all need to be well aware of SITA's Code of Conduct. It means working with integrity, honesty and openness, with respect for the law, SITA's Policies, and for each other's roles and responsibilities.

We all need to do the right thing, even when this might conflict with business objectives. By acting with integrity, in everything we do, we will ensure we maintain trust among our stakeholders, which is vital to our continued success.

Your compliance and support are necessary in continuing to uphold the principles embodied in our Code of Conduct.

David



1. OUR CODE – OUR RESPONSIBILITY

Our Code of Conduct is a public statement that SITA is committed to doing business the right way by acting honestly, fairly and with high standards of integrity. It is only by acting the right way that we build and maintain trust with our customers, third parties and business partners and preserve the excellent reputation of SITA.

Our Code serves as a valuable resource to help our People make sound, ethical decisions in the best interests of SITA. In order to help you do this, our Code contains cross references to applicable SITA Standards (SITA Policies, Procedures and Guidelines) and other useful resources and tools. As it is not possible to cover every possible situation, we rely on you to use good judgement and to speak up when you have questions or concerns.

As we operate in over 200 countries and territories, there may be times when local laws, regulations or customs conflict with or differ from our Code. In such cases, you should be guided by stricter standards.

1.1. Who must follow our Code?

Our Code of Conduct applies to all SITA employees.

We also expect and encourage all our contractors to act in a way that is consistent with our Code. We will take appropriate measures where we believe they have not met our expectations or their contractual obligations.

We collectively refer to all employees and contractors in our Code as 'our People'.

The actions of our third parties and business partners can have a direct impact on our reputation. For this reason, we aim to work with third parties and business partners who share our commitment to doing business the right way and which is consistent with our Code.

1.2. Non compliance

Anyone who violates any of the applicable laws, regulations, our Code or SITA Standards may cause liability and/or serious reputational harm to SITA and will be subject to appropriate measures, including disciplinary action where applicable.

1.3. Monitoring and review

The SITA Ethics Committee is responsible for oversight of compliance with our Code which includes the review of investigations carried out into potential violations of our Code. The Compliance & Ethics Committee will periodically engage Internal Audit to assist in this role and may, from time to time, commission an external audit.

1.4. Employee responsibilities

Our expectations:

- Be familiar with and understand the information in our Code.
- Act in a manner that is ethical, appropriate and consistent with applicable laws and regulations and SITA Standards; if you are unsure about a decision or action, ask yourself, how would this be seen by others?



- Complete the Code of Conduct training promptly, which includes certifying that you have read and understood our Code.
- Raise concerns if you become aware of possible violations of laws, regulations, our Code or SITA Standards. See section 6 on how you can speak up.
- Co-operate fully when responding to an investigation or audit.

1.5 Additional responsibilities of managers

Our expectations:

- Lead by example, acting as a good role model of ethical behavior.
- Help your team to understand the information in our Code and in the SITA Standards.
- Create a culture where ethical conduct is recognized and valued, and where compliance is viewed as important as performance.
- Encourage your team to ask questions and speak up and do your part to make sure that no one experiences retaliation for doing so.
- Ensure that all your team complete the required Code of Conduct training promptly.
- Consistently enforce our Code.



2. OUR PEOPLE

We are committed to enhancing SITA's reputation as a fair, diverse and equitable employer, providing professional development and learning opportunities in a safe working environment.

2.1. Diversity and equal opportunities

We respect diversity and promote equal opportunities, recruiting and promoting those we work with based on their skills and proficiency, irrespective of their age, ethnic origin, gender, religion or sexual orientation or any other characteristic protected by applicable laws.

Our expectations:

- Treat everyone with fairness, respect and dignity.
- Base your work-related decisions on merit alone without any prejudice.
- If you have any questions, contact HR.

2.2. Harassment

We strictly prohibit any form of harassment. Harassment includes any form of behavior with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive work environment.

Our expectations:

- Never send any offensive messages or make any derogatory remarks or inappropriate jokes.
- Understand that inappropriate comments of a sexual nature or any other sexually offensive behavior will not be tolerated.
- If you have any questions, contact HR.

2.3. Health, safety and security

We are committed to providing a safe and professional work environment to protect the health and well-being of those we work with to enable us to perform our roles effectively.

Our expectations:

- Report any accident, injury, illness or unsafe condition immediately to your Regional Site & Facilities Manager.
- Know the emergency procedures that apply where you work.
- Be familiar with the Health, Safety & Security Policy and the supporting HUB pages.
- If you have any questions, contact your Regional Site & Facilities Manager.

2.4. Abuse of Substances

You should not work under the influence of alcohol or drugs.



If you work under the influence of drugs or alcohol, you pose an unacceptable safety risk to yourself and others. Drugs may include illegal drugs, controlled substances or misused prescription medication. You are expected to perform your job duties free from the influence of any substance that could impair job performance.

| SITA Standards and useful resources and tools related to s.2 | |
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| Health, Safety & Security Policy | HR HUB pages |



3. OUR BUSINESS DEALINGS

We work with our third parties and business partners in an honest, respectful and responsible way. We comply with all applicable laws and support fair, open and free competition.

3.1. Conflicts of interest

We all have a duty to act in the best interests of SITA. A conflict of interest may occur when your personal interests or activities affect your ability, or which may appear to affect your ability, to make objective decisions on behalf of SITA.

Our expectations:

- Immediately disclose any potential conflict of interest situations to your manager using the Disclosures Register available on the Hub. These may include:
 - Outside jobs and affiliations with competitors, customers, or suppliers.
 - Working with close relatives, especially those who are ‘government officials’.
 - A ‘government official’ includes: officials or employees of any government or other public body, agency or entity, at any level, including officers or employees of state-owned enterprises and public international companies. It also includes candidates for political office, party officials and employees, as well as political parties.
 - Having an intimate relationship with anyone you work with who can influence decisions such as salary, performance rating or promotion.
 - Serving as a board member or director of any other company organization.
 - Investments, including those of close relatives, which influence or appear to influence your business judgement.
- If you have any questions, contact the Ethics Team.

3.2. Gifts and hospitality

We do not accept or provide gifts or hospitality in return for any business, services or confidential information, or if the intent is to improperly influence a decision.

Our expectations:

- You may offer or accept gifts and hospitality which meet the requirements in Disclosures Policy, the Travel Policy and Expenses Policy.
- Obtain Ethics approval before giving any gifts or providing any hospitality (including travel) to ‘government officials’, as defined in section 3.1 above. It is not necessary to obtain approval for any gifts which are SITA branded merchandise.
- Remember, it is common for commercial entities, such as airlines and airport authorities, to be either wholly or partially owned by the government, therefore anyone who works for those entities will be deemed a ‘government official’.
- If you have any questions, contact the Ethics Team.



3.3. Anti-bribery and corruption

We compete in the marketplace solely on the merits of our products and services and do not tolerate bribery and corruption in any form.

Our expectations:

- Do not offer, pay or accept bribes or kickbacks or any other kind of improper payment, including facilitation payments, for any purpose whether directly or through a third party.
 - *Kickbacks are agreements to return a sum of money to another party in exchange for making or arranging a business transaction.*
 - *Facilitation payments are small unofficial payments to low level government officials, as defined in section 3.1 above, to speed up or obtain routine administrative processes.*
- Be familiar with the Policy Prohibiting Bribery and Corruption, the Policy on Use of Intermediaries and Agents and the Disclosures Policy and obtain any necessary approvals.
- Keep accurate records so payments are honestly described and company funds are not used for unlawful purposes.
- If you have any questions, contact the Ethics Team.

3.4. Political activity

In accordance with applicable laws, we may decide to engage in lobbying activity to make our position known on relevant issues in the countries and territories where we operate. We do not make any company contributions to political candidates or parties.

Our expectations:

- Do not use company funds or resources to support any political candidate or party.
- Be familiar with the Policy Prohibiting Bribery and Corruption and the Policy on Use of Intermediaries and Agents and obtain the relevant approvals for any lobbying activity.
- If you have any questions, contact the Ethics Team.

3.5. Competition Law

Competition Law forbids cartels and other potentially anti-competitive agreements between businesses with a significant presence in the market in order to not allow the exploitation of a dominant position. All employees, but especially those who are involved in marketing, sales and purchasing, or who are in regular contact with competitors, have a responsibility to ensure that they are familiar with applicable competition laws.

If you have any questions, contact the Ethics Team. .



3.6. Procurement and competition

We compete for contracts in an honest and transparent matter, following all applicable procurement and competition laws, rules and regulation prohibiting unfair trade practices.

Our expectations:

- Do not influence the contents of any public tender or Request For Proposal (RFP) in favor of SITA.
- Make sure you understand the regulatory requirements, including any limitations, contained in any public tender or RFP. If you are unsure, contact Legal, Regulatory & Ethics.
- Never engage in any unlawful arrangement, whether written or implied, with a competitor to fix prices, rig bids, allocate customers and/or restrict supply.
- If you have any questions, contact Legal, Regulatory & Ethics.

3.7. Competitive intelligence

To stay competitive, we conduct extensive market research and invest in developing leading technology through research and development.

Our expectations:

- Do not obtain competitor information through inducement, deceit, theft or any unethical act.
- Ensure you return or destroy any information that is obtained inadvertently and that may constitute confidential information of a competitor.
- If you have any questions, contact Legal, Regulatory & Ethics.

3.8. Embargo and export control

We are committed to compliance with all trade laws, regulations and procedures that apply to our operations globally.

Our expectations:

- Be familiar with SITA's Policies and Guidelines relating to embargo and export control and the supporting HUB pages.
- If you are involved in the shipment of equipment for bids, contracts, delivery projects and operational purposes, make sure you are familiar with the Global Logistics and Spares Management (GLSM) process flows, specifically on when to engage GLSM for support.
- If you have any questions, contact the Ethics Team.



SITA Standards and useful resources and tools related to s.3

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| Expenses Policy | Policy on Use of Agents and Intermediaries |
| Global Logistics & Spares Management on the HUB | Policy Prohibiting Bribery and Corruption |
| Disclosures Policy | Travel Policy |
| Ethics on the HUB (Trade Sanctions) | Sanctions Policy |



4. OUR ASSETS AND INFORMATION

We all have a duty to protect SITA's assets and any business information we have access to, including the personal data of our People, customers, third parties, business partners and others. Company assets include facilities, property and equipment, computers and IT systems, information and funds.

4.1. Physical assets, including IT

We are conscientious and act appropriately to ensure company assets are not damaged, misused or lost.

Our expectations:

- Make sure your user ID's and passwords are secure.
- Be vigilant against cyber threats such as phishing attacks, and report any security incidents immediately to the SITA Service Desk via Service Gateway or email to corporate.support@sitaaero.com.
- Personal use of computer equipment, phones, email and internet access must be reasonable and not excessive. Any viewing of inappropriate material, which includes illegal activity, is strictly prohibited.
- Be familiar with the Corporate IT Policy.
- If you have any questions, contact Corporate Information Security Office (CISO).

4.2. Intellectual property

We ensure that SITA's intellectual property is protected and secure and avoid knowingly infringing the intellectual property rights of others.


Our expectations:

- Be familiar with SITA's Intellectual Property (IP), which includes: copyright, patents, trademarks and design rights. For more information, refer to the Legal pages on the HUB.
- If you are involved in product development, be familiar with the IPR Capture practices and Guidelines on Copyright, Confidentiality and Patents as well as the Open Source Governance program.
- Understand that SITA's IP is a corporate asset which generates revenue and therefore we must make sure we do not disclose our IP outside of SITA.
- If you have any questions, contact Legal, Regulatory & Ethics.

4.3. Confidential information

We expect all our People to safeguard, on a need to know basis, any SITA, third party or other confidential information to which you may have been given access.

Our expectations:

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- Know what type of confidential information you have access to. This may include, but is not limited to: financial data, pricing analysis, business plans, customer data, contracts and other non-public corporate data.
 - Do not disclose this information outside of SITA unless authorized to do so or use the information for any personal gain. You must not disclose confidential information even after you have finished working at SITA.
 - Take reasonable measures to secure this information, as detailed in the Corporate IT Policy, including locking it away when not using it.
 - If you have any questions, contact Legal, Regulatory & Ethics.

4.4. Protecting personal data

We respect and protect the privacy of our People, customers, third parties, business partners and others, only using personal data when needed to operate effectively or to comply with the law.

Our expectations:

- If you are involved in product development, ensure you are familiar with data protection laws and regulations regarding the collection, processing and use of personal data. For more information, contact Legal, Regulatory & Ethics.
- *'Personal data' can be anything that can be used to identify an individual, including but not limited to: name, address, data of birth, marital status, contact information and financial records, such as salary and benefits details.*
- If your role requires access to personal data, ensure you take reasonable measures to protect that information from unauthorized access, as detailed in the Corporate IT Policy.
- If you have any questions, contact Legal, Regulatory & Ethics.

4.5. Public communications

It is crucial that we promote and protect SITA's image and reputation, therefore ensure that any public communications are clear, accurate and consistent.

Our expectations:

- All media enquiries should be sent to the PR team at media.relations@sita.aero.
- Remember that your social posts and comments are not anonymous and can negatively impact SITA's reputation.
- Be familiar with the Press Release/Public Statement Policy, Issues/Crisis Management Policy and the Social Media Policy.
- If you have any questions, contact the PR team at media.relations@sita.aero.



4.6. Accurate books and records

We have a responsibility to be honest and transparent about our operations and performance. Our members/shareholders and business partners rely on accurate and complete disclosures and business records.

Our expectations:

- Ensure all transactions are properly authorized, recorded and reported as required.
- Follow applicable laws when retaining or destroying documents, including those in electronic formats.
- Be familiar with the Corporate IT Policy regarding email retention and what to do if SITA is subject to a legal hold notice.
- If you have any questions, contact Legal, Regulatory & Ethics.

| SITA Standards and useful resources and tools related to s.4 | |
|--|---------------------------------------|
| Corporate IT Policy | Press Release/Public Statement Policy |
| Legal pages on the HUB | Social Media Policy |
| Marketing pages on the HUB | |

4.7 Insider Trading

It is illegal to use material non-public information to make personal investment decisions to buy, sell, or trade in securities such as stocks, bonds, and options. This is considered insider trading and applies to associates, officers, and directors who have access to non-public information about SITA or our business partners, customers, contractors, and suppliers. The ban on insider trading includes using material non-public information to recommend investment decisions or to provide it to others to assist them in their investment decisions.

“Inside information” may include, but is not limited to:

- Information regarding upcoming mergers and acquisitions
- Changes in critical management
- Undisclosed financial results
- Development of new products and services

If you have any questions, contact legal, Regulatory & Ethics.

5. OUR CORPORATE SOCIAL RESPONSIBILITY

Our corporate social responsibility program (CSR) addresses the social and environmental impacts of our business operations. We strive to be a responsible business because it makes us a better business.

5.1. Managing our environmental impact

We recognize our duty to ensure that we do all that we can to adopt sustainable practices and to manage our environmental impact in all locations where we operate. We measure and report on the use of energy and resources.

Our expectations:

- Be familiar with and understand your responsibilities under the Environmental Policy.
- Be proactive and suggest ways of working that will improve our environmental performance.
- For further information or if you have any questions, refer to our CSR pages on the HUB, or contact CSR.

5.2. Engaging with our communities

We are committed to engaging with our communities by addressing industry-wide issues for air transport and acting philanthropically in the countries where we operate.

Our expectations:

- Be proactive and encourage those you work with to participate in the Value In Volunteer Action (VIVA) program. For more information on VIVA, refer to the CSR pages on the HUB.
- Ensure you work within the guidelines for any VIVA initiative.
- If you have any questions, contact CSR.

5.3. Responsible supply chain practices

We only work with suppliers that meet the legal requirements for environmental protection and labor practices and expect all our business partners to embrace the principles set out in our Supplier Code of Conduct.

Our expectations:

- Always consult Purchasing when you wish to engage a new supplier.
- If you work in Purchasing, make sure you have completed the Responsible Supply Chain training.
- Be familiar with the Supplier Code of Conduct.
- If you have any questions, contact Purchasing.

5.4. Commitment to human rights

We seek to conduct our business in a manner that respects the human rights and dignity of people. Each of us can play a role in the elimination of human rights abuses such as child labor, human trafficking and forced labor.

Our expectations:

- Support and respect the protection of human rights and ensure that our suppliers and other business partners do the same.
- Respect the right of those you work with to participate in employee representative bodies.
- If you have any questions, contact CSR.

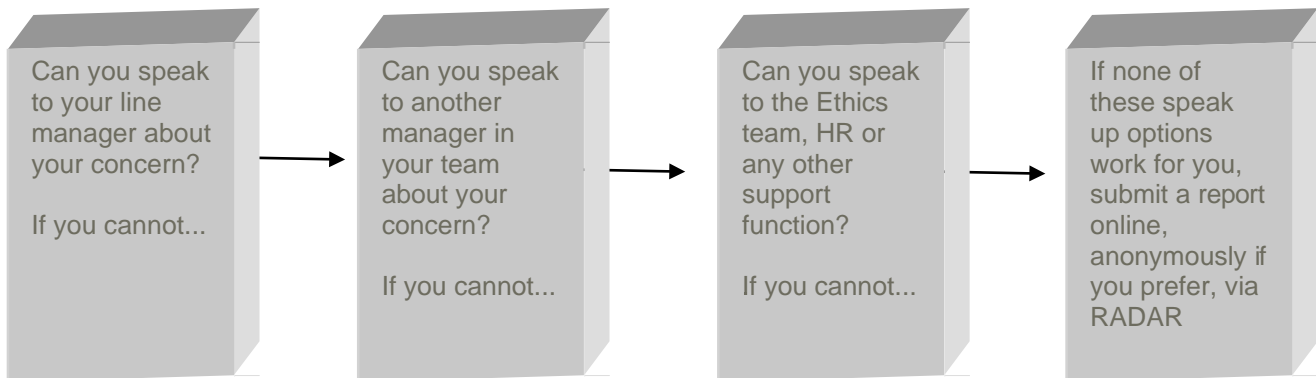
| SITA Standards and useful resources and tools related to s.5 | |
|--|-----------------------------|
| CSR Charter | Purchasing pages on the HUB |
| CSR pages on the HUB | Purchasing Policy |
| Environmental Policy | Supplier Code of Conduct |

6. HOW TO SPEAK UP WITHOUT RETALIATION

6.1 Speak up options

We all have a responsibility to speak up if we become aware of possible violations of laws, regulations, our Code or SITA Standards. Use the decision tree below to help you decide how to speak up.

If your concern relates to a grievance issue, such as you feel you are being treated unfairly in any way, contact your line manager and/or your local HR representative who will be able to advise you.



6.2 How to contact the Ethics Team

You can find details on how to contact the team, details of the Ethics function and how to submit an online report via RADAR on the dedicated Ethics pages on the HUB:

<https://sita365.sharepoint.com/sites/TheHub/Ethics>

All concerns reported to the Ethics Team will be investigated promptly and thoroughly, in accordance with applicable laws and company procedures. Feedback on results of the investigation will be provided in a timely manner.



You can raise a concern directly [here](#)

6.3 Zero tolerance on retaliation

We do not tolerate retaliation against anyone making reports in good faith and/or assisting in investigations of possible violations. Any retaliation will be treated as a violation of our Code.

Our expectations:

- If you are aware of retaliation against anyone who has raised a concern, speak up. Retaliation can take many forms, for example, making threats, intimidation and exclusion.
- Ensure any report made is made in good faith.
 - *Good faith means submitting a concern without malice and with plausible reason to*

believe it is true.

- If you have any questions, contact the Ethics team.

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| SITA Standards and useful resources and tools related to s.6 |
| Non-retaliation Policy |

“DO THE RIGHT THING”