



# ANTI-BRIBERY & ANTI-CORRUPTION POLICY

## **Policy description**

This Policy provides core SITA rules to ensure full compliance with anti-bribery and anti-corruption legislation.

## **Policy owner**

General Counsel

## **For questions related to this policy, contact**

Global Head of Ethics & Compliance

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**SITA**



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# 1 OUR COMMITMENT

SITA prohibits bribery and corruption in any form, anywhere we operate, reflecting our commitment to always act with integrity. Our global reputation and success depend on conducting our business in accordance with applicable laws and to the highest ethical and legal standards as set out in our Code of Conduct.

Compliance to this Anti-Bribery and Anti-Corruption Policy is mandatory.

# 2 POLICY STATEMENT

- 2.1 SITA is committed to conducting business in an ethical and honest manner, and to implementing and enforcing policy and systems that ensure bribery and corruption are prevented. SITA has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever we operate.
- 2.2 SITA will consistently act in accordance with the laws relating to anti-bribery and anti-corruption in all the jurisdictions, where it conducts business. We operate under the umbrella of not only the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act, but also under those national and state laws applicable in the sovereign nations in which we operate. This relates to our conduct both at home and abroad.
- 2.3 A breach of any of these Anti-Bribery and Anti-Corruption laws could have serious consequences for the company and individuals involved, including imprisonment and fines.
- 2.4 In addition to the Anti-Bribery and Anti-Corruption Policy, SITA has also in place a Code of Conduct and an Intermediaries Policy. These should be read in conjunction with the Anti-Bribery and Anti-Corruption Policy and can be found on the SITA Hub.

# 3 SCOPE

This policy applies to all directors and employees (whether full or part time) of SITA, our subsidiaries and joint ventures where SITA has a controlling interest. It also applies to any third part contractor, agents or consultants representing or acting on behalf of SITA.

# 4 OUR EXPECTATIONS

SITA expects full compliance with this Policy and associated guidelines. Anyone who violates the provisions of this Policy or associated guidelines may cause liability and/or serious harm to SITA and will be subject to appropriate measures, including disciplinary action where applicable, up to and including termination.

# 5 WHAT IS BRIBERY AND CORRUPTION?

- 5.1 Bribery is the offer or receipt of anything of value (which could be financial or non-financial) or other advantage to or from any person to encourage them to do something which is dishonest, illegal or a breach of trust in the performance of their role. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept, or even request it, they are also breaking the law.
- 5.2 Corruption is the abuse of entrusted power for private gain which can take many forms that vary in degree from the minor use of influence to institutionalised bribery.
- 5.3 SITA may be held liable for improper acts committed by third parties acting on its behalf. This includes acts relating to the securing of business such as logistics or securing licences and permits and may arise, whether or not SITA had knowledge or suspicion of wrongdoing.
- 5.4 Additional care should be taken when dealing with Public Officials as the laws and enforcement are particularly strict. Who is a Public Official is broadly defined and includes officials and employees of all branches of government and state owned/controlled businesses or enterprises (including airlines),



political party officials and individuals working on behalf of public international organisations (e.g. the UN). Family members of these individuals are also included.

## 6 GUIDANCE ON SPECIFIC RISK

It is important that employees are able to identify where bribery might arise in their everyday roles. Set out below are examples that require particular attention:

### 6.1 **Facilitation Payments**

In most countries where we do business, facilitation payments are considered bribes and are illegal. SITA prohibits the making of facilitation payments whether or not permitted by local laws. Facilitation payments involve payment to a public official to expedite or facilitate the performance of a routine governmental action, such as obtaining a permit or visa. These tend to be made to low level officials with the intention of securing or speeding up the performance of a certain duty or action.

### 6.2 **Kickbacks**

SITA does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

### 6.3 **Political Contributions**

SITA will not make donations, whether in cash, in kind, or by any other means, to support any political parties or candidates.

### 6.4 **Charitable Contributions**

SITA accepts (and indeed encourages) the act of donating to charities, whether through services, knowledge, time, or direct financial contributions (cash or otherwise). This process must be absolutely transparent, and all charitable contributions must be recorded and disclosed.

Employees must ensure that charitable contributions are not used to facilitate and conceal acts of bribery. Should any query with regards to this arise please contact the Global Head of Ethics & Compliance for advice.

We will ensure that all charitable donations made are legal and ethical under local laws and practices. Should any query with regards to this arise please contact the Global Head of Ethics & Compliance for advice.

All charitable donations made or offered must have the prior written approval from the Global Head of Ethics & Compliance

### 6.5 **Conflicts of Interest**

We seek to avoid conflicts of interest, but where they occur, we manage them by making appropriate reports to our management.



## 7 EMPLOYEE RESPONSIBILITIES

- 7.1 As an employee of SITA, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.
- 7.2 All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.
- 7.3 If you suspect that there is an instance of bribery or corrupt activities occurring in relation to SITA, you are encouraged to raise your concerns as early as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should raise the issue through RADAR, speak to your line manager, or contact the Ethics & Compliance team.

## 8 RAISING A CONCERN OR ASKING QUESTIONS?

- 8.1 SITA will familiarise all employees with its whistleblowing procedures (RADAR) so employees can vocalise their concerns swiftly and confidentially. The link to RADAR can be found [here](#).
- 8.2 It is up to every employee, contractor and third parties to speak up if they believe that they have seen any behaviour or actions that may breach this policy.
- 8.3 RADAR is confidential and can be anonymous if you so choose.
- 8.4 SITA encourages every employee to seek help or further guidance if unsure of any aspect of this policy. If you have a question or are simply unsure of something you have seen, do not hesitate to contact the Global Head of Ethics & Compliance or any member of the Ethics & Compliance team.

## 9 ZERO TOLERANCE TO RETALIATION

- 9.1 SITA will not tolerate any form of retaliation against anyone who has raised a concern and/or assisted in an investigation in good faith, even if the investigation finds that they were mistaken. Any form of retaliation will be deemed to be a violation of the Code of Conduct and may result in disciplinary action.
- 9.2 SITA will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.
- 9.3 Detrimental treatment refers to dismissal, disciplinary action, threats, or unfavourable treatment in relation to the concern the individual raised.
- 9.4 If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the Ethics & Compliance team immediately or raise a concern through RADAR.

## 10 TRAINING AND COMMUNICATION

- 10.1 SITA will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will bi-annually acknowledge and accept that they will comply with this policy.
- 10.2 SITA's anti-bribery and anti-corruption policy and zero-tolerance attitude will be clearly communicated



to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.

## 11 RECORD KEEPING

SITA will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. SITA will declare and keep a written record in a Gifts, Hospitality and Entertainment Register including the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

## 12 MONITORING AND REVIEW

- 12.1 SITA's Global Head of Ethics & Compliance is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.
- 12.2 Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.
- 12.3 Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Global Head of Ethics & Compliance.
- 12.4 This policy does not form part of an employee's contract of employment and SITA may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

## 13 ASSOCIATED POLICIES

[Code of Conduct](#)  
[Expenses Policy](#)  
Gifts, Hospitality & Entertainment Policy  
[Intermediaries Policy](#)  
[Travel Policy](#)

## 14 USEFUL CONTACTS

Any questions or queries with regards to this policy should be addressed to the Global Head of Ethics & Compliance whose details can be found [here](#).