



SITA

Code of Conduct

Policy Description:

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

Policy owner:

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For any questions relating to this policy, contact:

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FOREWORD BY OUR CEO



Dear Colleagues,

SITA has earned a strong reputation across the global air transport industry. We are a trusted partner with a respected brand, supported by a global community of members and customers.

Wherever we operate, integrity and responsible conduct matter. They are expected by our stakeholders, monitored by regulators, and watched closely by the media. This is why it's essential that each of us fully understands our Code of Conduct and feels confident in raising questions or concerns, especially if and whenever something doesn't feel right.

Reputation is built over time, yet it can be lost quickly. We safeguard it by upholding our Code – acting with integrity, honesty, and transparency in everything we do. By respecting the law, SITA policies, and the roles and responsibilities of our colleagues, we strengthen the culture that protects that reputation.

We must always choose the right path, even when it challenges short-term business objectives. Acting with integrity in every decision is what preserves the trust of our stakeholders, and that trust is essential to our long-term success.

Your compliance, commitment and support for these principles are essential to ensuring that we continue to operate with the highest standards of conduct across SITA.

David

1. OUR CODE – OUR RESPONSIBILITY

Our Code of Conduct (the “**Code**”) reflects SITA’s commitment to conducting business responsibly, ethically and in compliance with applicable laws wherever we operate.

In this Code, we refer to all employees of SITA and contractors as our “**People**”.

It supports our sustainability objectives and reinforces our shared responsibility to act with integrity in our relationships with customers, third parties and business partners, thereby protecting SITA’s reputation and long-term value.

Our Code serves as a practical guide to help our People make ethical decisions and act in line with SITA’s values and legal obligations.

This Code is a stand-alone document and sets the minimum standards expected of everyone covered by it. SITA policies and standards support this Code by providing additional detail; where a specific policy applies to a topic covered in this Code, we reference it in the relevant section.

THE CODE



Integrity



Accountability



Compliance



Transparency



Responsibility

SITA complies with all applicable laws and regulations wherever we operate.

Further information and contacts are set out in this Code. For overall guidance, please contact the Ethics Team.

1.1. Applicability

This Code applies to all People across the SITA Group. In this Code, “SITA” means the companies controlled by SITA SC or SITA N.V.

We also expect contractors who work for or on behalf of SITA to act in line with this Code and with their contractual obligations. Where they do not, we will take appropriate action.

The actions of third parties and business partners can affect SITA's reputation directly. We therefore seek to work with third parties who share our commitment to ethical conduct and compliance with applicable laws.

Our expectations of third parties are reflected in the SITA Supplier Code of Conduct and in the relevant contractual requirements.

1.2. Non-compliance

Anyone who violates applicable laws, regulations or this Code may expose SITA to legal and reputational risk and will be subject to appropriate measures, including disciplinary action where applicable.

1.3. Monitoring and Review

Oversight of compliance with this Code, including review of investigations into potential violations, sits with the **Ethics Committee**.

Internal Audit may support assurance activities from time to time, and SITA may commission external reviews where appropriate to assess the effectiveness of the Code and related controls.

1.4. Responsibilities of Our People

The responsibilities set out in the Code apply to all our People:

People Managers have in addition, further responsibilities to:

- Lead by example, acting as a good role model of ethical behaviour.
- Help your team to understand the information in our Code.
- 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.

2.2. Harassment

We strictly prohibit any form of harassment or bullying. Harassment includes any form of behaviour with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive work environment. Bullying includes repeated unwanted behaviours that undermine, intimidate, humiliate or cause harm to another person in the workplace. Allegations of harassment and bullying will be taken seriously and investigated appropriately in accordance with local labour laws.

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, please contact your local People Country Manager.

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.

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

Conflicts of interest can occur when personal relationships, external activities or financial interests influence — or appear to influence — your decisions at SITA. We must always act in SITA's best interests and maintain independent judgement.

Our commitment:

- We disclose any personal interest or situation that could influence our actions at work.
- We avoid situations where our judgement or integrity could be questioned.
- We take guidance when unsure — because preventing a conflict is always easier than fixing one.

Your responsibilities:

- You must disclose any actual, potential or perceived conflict of interest as soon as you become aware of it.
- You must not allow personal interests to interfere with work decisions.
- Seek advice from your manager or Ethics & Compliance if you are unsure.

Situations that require disclosure include Outside employment or board roles; close personal or family relationships at work; personal investments related to SITA's lines of business; or connections with public sector or state-owned entities.

3.2. Gifts & Hospitality

Gifts and hospitality must never influence — or appear to influence — business decisions. They must always be modest, reasonable, transparent and for a legitimate business purpose.

Our commitment:

- We never give or accept anything that could be seen as a bribe or reward for favourable treatment.
- We always follow SITA's approval and disclosure rules before offering or accepting gifts or hospitality.
- We apply extra care in interactions involving public sector or state-owned entities — which include many airlines and airports.
- We ask for guidance whenever there is uncertainty.

If you are offered something that doesn't feel right — your integrity comes first. Politely decline and seek advice.

Your responsibilities:

- You must follow SITA's rules for giving or receiving any gifts or hospitality — including pre-approval where required.
- You must not offer or accept anything that could be seen as a bribe, reward, or attempt to gain improper influence.
- Additional approval requirements apply for public officials — which include many airlines and airport employees.

3.3. Anti-bribery and Corruption

At SITA, we act according to the highest ethical standards in every market where we operate. We compete fairly — based on the excellence of our products and services — and we have zero tolerance for bribery and corruption in any form. Acting ethically protects our colleagues, our customers, and our reputation as a trusted global partner in the aviation industry.

Our commitment:

We do not, under any circumstances, offer, give, request, or accept anything of value intended to improperly influence a business decision or secure an unfair advantage. This applies to everyone at SITA, everywhere we operate, and to anyone acting on our behalf.

Your responsibilities:

- Never offer or accept bribes, kickbacks, facilitation payments, or any other improper advantage — whether directly or through a third party.

- Kickbacks are agreements to return part of a payment as a reward for securing business. These are strictly prohibited.
- Facilitation payments are small, unofficial payments made to speed up routine actions by public officials. These are strictly prohibited.
- Be especially cautious when interacting with public officials or state-owned entities. Extra care is required as laws are particularly strict in these contexts.
- Keep accurate and transparent records of all payments, gifts, and hospitality. False or misleading entries are never acceptable.
- Disclose potential conflicts of interest, gifts, or hospitality in accordance with SITA's Disclosures Policy and obtain approvals where required.
- Engage only authorised intermediaries and third parties, in line with SITA's Intermediaries Policy. Ensure due diligence and contractual safeguards are in place before engaging any external representative.
- Seek advice if you are ever uncertain. Contact the Ethics Team or raise your concern through RADAR (refer section 6) -confidentially and, if needed, anonymously.
- Every one of us plays a role in preventing bribery and corruption. Failure to comply with these requirements can result in disciplinary action, legal penalties, or serious reputational harm to SITA and the individuals involved.

If you have concerns or questions, speak up early — your voice protects SITA and reinforces our culture of integrity.

3.4. Fraud and Misrepresentation

Fraud and misrepresentation have no place at SITA. We must act honestly, keep records and statements accurate, protect company resources, and never deceive customers, colleagues, suppliers, auditors, regulators, or anyone else we deal with.

Your responsibilities:

- Act honestly and transparently in all business dealings, and never use deception to gain an improper advantage for yourself or anyone else.
- Do not falsify or manipulate records, data, timesheets, certifications, test results, expense claims, invoices, or any other business information.
- Do not make false, incomplete, or misleading statements to customers, suppliers, colleagues, auditors, regulators, or other third parties.
- Protect company assets, funds, and confidential information, and never misuse them for personal benefit or any improper purpose.
- Be alert to fraud risks involving third parties such as suppliers, consultants, agents, and contractors, and raise concerns promptly.
- Report any suspected fraud, attempted fraud, or misrepresentation immediately, and do not investigate it yourself.

3.5. Charitable Donations

SITA supports charitable causes that align with our values and sustainability pillars. Donations can create positive impact, but they also carry risks such as misuse of funds, reputational harm, or actual/perceived bribery.

A charitable donation is a voluntary contribution to a registered non-profit organization with no expectation of commercial return. Any recognition (such as displaying our name or logo) must be secondary to supporting the cause.

Your responsibilities:

- Never offer or approve a donation to influence a business decision or gain an improper advantage.
- Follow all SITA policies and approval processes, including the Anti-Bribery and Corruption Policy and Finance procedures.
- Ensure the recipient is a legitimate, reputable, registered organization and that the cause aligns with our sustainability pillars (Environment, Innovation or Community).
- Do not make donations to individuals, unregistered entities, political or religious bodies, or to customers, suppliers or public officials.
- Ensure donations are properly documented, approved in advance, and processed through the correct Finance channels.
- Raise questions or concerns contact CSR team

Improper donations may breach this Code and applicable laws and may lead to disciplinary actions.

3.6. Sponsorships

SITA may sponsor external events or organizations where there is a clear and legitimate business benefit, such as brand visibility or industry engagement. Sponsorships must be transparent, documented and aligned with our values.

A sponsorship is support (financial or in-kind) provided in exchange for measurable benefits to SITA.

Your responsibilities:

- Never use sponsorships to influence business decisions or provide hidden benefits to customers, suppliers or public officials.
- Clearly document the purpose, value and expected benefits of any sponsorship.
- Follow all relevant approval processes and SITA policies, including the Anti-Bribery and Corruption Policy and Disclosures Policy.
- Avoid sponsorships that create actual or perceived conflicts of interest or that could damage SITA's reputation.
- Ensure written agreements are in place and payments are made only to the official account of the sponsored organization.
- Keep accurate records and escalate any red flags to Ethics Team.
- Improperly structured sponsorships can pose bribery and reputational risks and may lead to disciplinary actions.

3.7. 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.

Your Responsibilities:

- 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.

3.8. Competition Law

SITA competes fairly and in full compliance with applicable competition and antitrust laws. These laws protect markets, customers and innovation by preventing anti-competitive behavior and the abuse of market power.

Any breach can lead to severe penalties for SITA — and personal legal liability for employees involved.

Your responsibilities:

- You must not enter into any formal or informal agreement or discussion with competitors that restricts competition.
- You must not fix or coordinate prices, market shares, margins, bids, discounts, or commercial terms.
- You must not share commercially sensitive information with competitors — including pricing, cost structure, sales strategies, or customer details.
- You must conduct market research only through lawful and publicly available sources or approved tools.

Additional requirements apply when dealing with suppliers, distributors or partners:

- You must consult Legal before granting exclusivity or imposing restrictions that could limit fair competition.
- You must not use SITA's strong market position to unfairly disadvantage customers, partners or other competitors.
- Competitive intelligence must be gathered lawfully and ethically. We compete on the merits of our products and services, not by misusing confidential information or engaging in deceptive practices.
- Use publicly available information or sources you are authorised to access, respect confidentiality and intellectual property.
- Do not obtain information through deception, inducement, theft, hacking, or any other improper means (including asking others to do so).
- If you receive confidential information inadvertently, stop reviewing it, do not copy or share it, and contact M&A Legal for guidance.
- Never exchange commercially sensitive information with competitors or discuss prices, bids, customers, capacity or other topics that could restrict competition.

Fair competition is not optional — compliance with antitrust laws is mandatory at SITA.

If you are unsure, contact the M&A Legal Team for guidance.

3.9. Procurement

We buy goods and services fairly, ethically, and in line with SITA's policies and applicable laws. Procurement decisions must be objective, properly approved, based on legitimate business needs, and supported by appropriate due diligence and documentation.

Your responsibilities:

- Follow SITA's procurement, approval, and supplier management processes before committing to any purchase or supplier engagement.
- Treat suppliers fairly, complete the required due diligence, manage risks such as sanctions, privacy, and cybersecurity, and disclose any conflict of interest.
- Keep complete and accurate procurement records, and do not split purchases, bypass controls, or create side arrangements to avoid approvals.

3.9.1. Procurement for Bid

When competing for contracts, bids, or tenders, we act honestly, independently, and in line with procurement, competition, and anti-corruption laws. We do not seek unfair advantage or compromise the integrity of the bidding process.

Your responsibilities:

- Do not seek to influence tender requirements, evaluation criteria, or decision-makers improperly, and do not obtain confidential bid information you are not authorised to have.
- Understand and follow the rules of each tender or request for proposal, including any legal, regulatory, confidentiality, and communication restrictions. Seek advice early if you are unsure.
- Never coordinate with competitors on prices, bids, customers, or supply, and never enter any arrangement that could amount to bid rigging or another competition law breach.
- If you need help, contact Procurement, Legal, or the Ethics Team before your act.

3.9.2. Responsible Supply Chain Practices

We expect our suppliers and business partners to uphold the same high standards of ethics, labour, human rights, and environmental responsibility that we apply to ourselves. Through our Supplier Code of Conduct and due diligence processes, we promote responsible sourcing and support transparency and sustainability across our supply chain.

Our expectations:

- Always consult Procurement Team when you wish to engage a new supplier and work with partners who demonstrate compliance with applicable environmental, social and governance standards.
- If you work in Procurement Team, make sure you have completed the Responsible Supply Chain training and work with Sustainable Sourcing Principles.
- Be familiar with the Supplier Code of Conduct and raise any concerns about supplier practices promptly.
- If you have any questions, contact Procurement Team.

3.10. Sanctions and Export Controls

SITA complies with applicable trade sanctions and export control laws wherever we operate. These rules can restrict who we do business with, where we do business, and how goods, software, technology, and services are transferred across borders. We must identify risks early, follow SITA's controls, and seek advice whenever there is uncertainty.

Your responsibilities:

- Follow SITA's sanctions and export control procedures, including required screening, approvals, and escalation steps.
- Do not engage with restricted parties, prohibited destinations, or blocked transactions unless you have confirmed that the activity is permitted and all approvals are in place.
- Before exporting, re-exporting, transferring, or giving access to controlled goods, software, or technology, make sure the required classification, approvals, and licenses are in place.
- Keep complete and accurate records of screening, approvals, licenses, and shipments, and follow record-retention requirements.

- Complete required training and report any actual or suspected sanctions or export control issue immediately to the Ethics Team.

SITA Standards and resources related to Section 3	
Expenses Policy	Policy on Use of Agents and Intermediaries
Global Logistics & Spares Management on the SharePoint	Policy Prohibiting Bribery and Corruption
Disclosures Policy	Travel Policy
Ethics on the SharePoint (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.

Assets and Information Protection



4.1. Physical Assets, Including IT

Physical assets and IT resources are essential to how SITA operates. We must protect them from loss, damage, theft, misuse, and unauthorised access, and use them responsibly for legitimate business purposes.

Your responsibilities:

- Make sure your user IDs 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@sita.aero.

- 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 Enterprise Information Security Office (EISO).

4.2. Intellectual Property

Intellectual property is a valuable SITA asset. It includes things such as inventions, software, designs, trademarks, copyright, confidential know-how, and trade secrets. We must protect SITA's intellectual property and respect the intellectual property rights of others.

Your responsibilities:

- Protect SITA intellectual property by using it appropriately, following internal processes, and helping to prevent unauthorised use, disclosure, or loss.
- Respect the intellectual property rights of others. Do not copy, use, share, or incorporate third-party materials, software, code, brands, or content unless you are authorised to do so.
- If you work on products, software, innovation, or branding, follow SITA's IP, open-source, confidentiality, and approval processes before releasing, publishing, or sharing materials.
- Keep confidential know-how, inventions, source code, designs, and trade secrets secure, and do not disclose them outside SITA unless appropriate protection is in place.
- Seek advice early if you are unsure about ownership, licensing, open-source use, confidentiality, branding, publication, or release approvals.

4.3. Data Confidentiality

We must protect SITA data from unauthorised access, disclosure, alteration, loss, or misuse. This includes business, customer, employee, and other sensitive information. We handle data carefully, share it only when there is a legitimate business need, and apply the right level of protection based on its sensitivity.

Your responsibilities:

- Identify and classify data based on its sensitivity, and apply the right protections for public, internal, confidential, and other restricted information.
- Access and share data only if you are authorised to do so and only to the extent needed for a legitimate business purpose.
- Follow the principle of least privilege: users and systems should have only the minimum access necessary to perform their tasks.
- Protect confidential information at all times and share it only on a need-to-know basis using approved methods and locations.
- Remove, mask, or minimise personal or other identifying information where full data visibility is not needed.
- Store, transfer, and dispose of data securely, follow SITA's IT and security controls, and take practical steps such as locking screens and keeping documents clear of unauthorised view.
- Report any suspected loss, unauthorised access, disclosure, or misuse of data immediately, and follow monitoring and logging requirements where they apply to your role.

4.4. Privacy & Data Protection

We handle personal data responsibly and in line with applicable privacy and data protection laws. We respect the privacy rights of our people, customers, and others, and we collect, use, share, retain, and delete personal data only for legitimate purposes and with the right safeguards.

Your responsibilities:

- Use personal data only for approved, legitimate business purposes and handle only the minimum personal data needed.
- Complete the required privacy reviews, impact assessments, and approvals before starting or materially changing any processing of personal data.
- Access, use, and share personal data only if you are authorised to do so and only with people who have a legitimate need to know.
- Share personal data securely, use approved tools and methods, and follow SITA's privacy, confidentiality, and information security controls at all times.
- Keep personal data only for as long as needed and delete or anonymise it when it is no longer required, in line with SITA's rules and legal obligations.
- Report any suspected or actual loss, unauthorised access, disclosure, or misuse of personal data immediately, and seek guidance quickly if you are unsure what to do.

4.5. Artificial Intelligence

AI can support innovation and efficiency, but it must be used responsibly, lawfully, and securely. We must use AI in a way that protects people, respects privacy and intellectual property, reduces bias and error, and reflects SITA's standards of accountability and transparency.

Your responsibilities:

- Use only approved AI tools and use cases, and follow SITA's AI policies, standards, and governance processes.
- Do not enter confidential, personal, customer, or other sensitive information into AI tools unless the use is approved and the necessary protections are in place.
- Keep human oversight over important decisions. Check AI-generated outputs for accuracy, bias, appropriateness, and legal or regulatory risk before you use or share them.
- Before creating, changing, or deploying an AI use case, complete the required approval, risk assessment, privacy, and security reviews.
- Be transparent about material use of AI where required, and make sure appropriate documentation, instructions, limitations, and monitoring are in place.

4.6. Information Security

Information security helps protect SITA's systems, data, services, and reputation. We must use our systems responsibly, follow security controls, and help prevent unauthorised access, cyber threats, and data loss.

Your responsibilities:

- Follow SITA's information security policies, standards, and always required controls.
- Follow SITA's information security policies, standards, and required controls at all times.
- Handle sensitive information securely, use approved tools and locations, and take practical steps such as locking screens and protecting devices.

- Report suspected phishing, malware, unauthorised access, loss of devices, or any other security incident immediately.
- Use company systems, devices, and networks responsibly and in line with applicable laws, regulations, and SITA policies.

4.7. Public Communications

Public communications can affect SITA's reputation, relationships, and legal obligations. We must make sure that any public statement about SITA is accurate, consistent, appropriate, and made only by authorised people.

Your responsibilities:

- Only authorised spokespeople may speak to the media, make public statements on behalf of SITA, or approve external communications.
- Make sure any information you share externally is accurate, appropriately approved, and does not mislead, speculate, or create commitments SITA has not authorised.
- Use caution on social media and in other online activities. Do not disclose confidential information, and do not post anything that could harm SITA's reputation or imply you are speaking for SITA without authorisation.
- Follow SITA's communication, crisis management, and social media policies, and seek guidance from Corporate Communications before sharing information publicly if you are unsure.

4.8. Record Keeping

Accurate records help SITA operate responsibly, meet legal and regulatory requirements, support sound decision-making, and demonstrate what we have done. We must create, keep, protect, and dispose of records properly.

Your responsibilities:

- Create records that are accurate, complete, timely, and truthful. Never falsify, backdate, conceal, or make misleading entries.
- Keep records for the required period and dispose of them only in line with SITA's retention and disposal rules.
- Protect confidential, personal, and sensitive records by storing, sharing, and disposing of them securely and limiting access to people with a legitimate business need.
- Do not alter, destroy, or delete records that may be needed for an investigation, audit, litigation, or regulatory request.
- Seek guidance if you are unsure what to keep, how long to keep it, or whether a legal hold or other restriction applies.
- If you need help, contact the Ethics Team, or the relevant records owner.

5. OUR SUSTAINABILITY COMMITMENTS

SITA's sustainability approach reflects our responsibility to create long-term value for our stakeholders, while minimizing negative impacts on people and the planet. We integrate environmental stewardship, social responsibility, and sound governance principles into the way we operate because acting responsibly makes us a stronger, transparent, more resilient, and trusted business.

5.1. Managing Our Environmental Impact

We are committed to embedding environmental practices across all our operations, products, and services. We measure, monitor, and report on our energy use, emissions, and resource efficiency, continually seeking to reduce our environmental footprint and contribute to global climate goals.

Your Responsibilities:

- Be familiar with and understand your responsibilities under SITA's Environmental Policy.
- Complete the mandatory Sustainability Training, which includes good environmental practices.
- Integrate environmental considerations into daily work and decisions, especially by applying Sustainability-by-Design principles in hardware, software, and service delivery.
- Promote efficient use of resources and technologies and proactively suggest improvements to environmental performance.
- Raise any environmental concerns or ideas through the appropriate internal channels (contact the CSR team or report through RADAR).

5.2. Engaging with Communities

We want to make a positive contribution to the communities where we operate. We support responsible volunteering, community engagement, and social impact initiatives that reflect SITA's values, strengthen trust, and are carried out in a transparent and appropriate way.

Your responsibilities:

- Take part in community and volunteering activities responsibly and in line with approved SITA programs and local requirements.
- Make sure community activities are lawful, transparent, and do not create conflicts of interest or improper commitments on behalf of SITA.
- Follow SITA's rules for volunteering, donations, sponsorships, and use of company resources before making commitments or contributions.
- If you have ideas for community initiatives or are unsure how to proceed, seek guidance from the CSR Team before acting.

5.3. Responsible Supply Chain Practices

We expect suppliers and other business partners to meet high standards of ethics, human rights, labour practices, environmental responsibility, and legal compliance. We promote responsible sourcing through due diligence, clear expectations, and ongoing oversight.

Your responsibilities:

- Use SITA's approved procurement and supplier onboarding processes before engaging a new supplier or business partner.

- Make sure appropriate due diligence is completed and work with suppliers that can meet SITA's standards on ethics, human rights, labour, environment, privacy, security, and legal compliance.
- Be familiar with SITA's Supplier Code of Conduct and raise concerns promptly if you see signs of misconduct, unsafe practices, modern slavery, or other serious supplier risks.
- If you are unsure how to proceed, seek guidance from Procurement, Sustainability, Legal, or Ethics & Compliance before acting.

5.4. Commitment to Human Rights

SITA is committed to respecting human rights in our operations and business relationships. We support fair treatment, safe and respectful working conditions, freedom from forced labour and child labour, and responsible business conduct that reflects internationally recognised human rights principles.

Your responsibilities:

- Treat people with dignity, fairness, and respect, and never tolerate forced labour, child labour, human trafficking, or other abusive practices.
- Consider human rights risks when working with suppliers, customers, and other business partners, and raise concerns if something does not seem right.
- Respect the right of people to raise concerns, be heard, and, where lawful, exercise freedom of association and representation.
- Report any suspected human rights concern promptly through the appropriate channels and seek guidance if you are unsure how to proceed.

6. SITA'S WHISTLEBLOWING SYSTEM

Speak-Up process flow

Confidential, objective, and handled promptly.



6.1. Speaking Up — Without Retaliation

We all play a role in protecting SITA's integrity. If you see, hear or suspect behaviour that may violate the law, this Code, or any SITA policy, you must speak up. Raising concerns early helps us address issues before they become serious.

Speaking up is a professional responsibility — and a mandatory requirement for everyone at SITA. Your voice helps keep our workplace safe, fair and compliant.

6.2. How to Speak Up

Colleagues working at customer sites or in operational environments should use their local management or designated Legal / HR contact as their first point of guidance where appropriate.

Start with the channel that feels most comfortable:

- Your line manager
- Any other manager you trust
- Your local HR representative
- The Ethics Team

If you prefer to raise a concern confidentially or anonymously — or if you feel unable to use the channels above — use RADAR, SITA's secure, independent whistleblowing system (accessible via The Hub).

You can:

- Submit an online report
- Use your local hotline number (where available)
- Track updates and provide more information over time
- All reports are reviewed promptly and handled in line with applicable laws and SITA procedures. Investigations are carried out professionally and objectively.

If your concern relates only to a personal grievance or working relationship issue, please speak directly with your manager or HR first — they are best placed to support you.

6.3. What Can Be Reported?

RADAR can be used to report any compliance or ethical concern, including:

- Harassment, discrimination or bullying
- Bribery, fraud, corruption or antitrust issues
- Conflicts of interest
- Financial misconduct, asset misuse or data security issues
- Health, safety, security, environmental concerns
- Modern slavery or human rights risks
- Any suspected violation of this Code or SITA Standards

If you think something may be wrong — report it. Do not investigate it yourself. Reports made in good faith are always the right thing to do.

6.4. Zero Tolerance for Retaliation

SITA strictly prohibits retaliation against anyone who raises a concern or supports an investigation in good faith. Retaliation is a serious breach of this Code and will lead to disciplinary action, up to and including dismissal.

Non-Retaliation Policy

Retaliation can include:

- Threats, intimidation or humiliation
- Exclusion from work activities
- Negative changes to duties, evaluations, pay or opportunities
- Creating a hostile or uncomfortable environment

If you experience or witness retaliation — report it immediately.

Good faith means raising a concern honestly, with reasonable belief that something may be wrong — even if the concern is not confirmed after review.



Our Code. Our Responsibility.

Thank you for helping uphold SITA's standards
of integrity, respect and accountability.