SITA ENVIRONMENTAL POLICY

Policy description
This policy describes SITA's environmental principles.

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SITA Environmental Policy

1 FOREWORD

Taking responsibility for its impact on the environment is essential to SITA. It must ensure that in every location where it operates, for any goods and services SITA buys and sells, SITA does all that it can to adopt sustainable practices and reduce and mitigate its environmental impact and those of its customers, in compliance with local, regional, and international laws, standards, and frameworks.

Beyond meeting local, regional, and international laws and standards, SITA sets and adheres to stringent requirements of its own to ensure the responsible use of energy and natural resources throughout its operations, including conserving energy, improving energy efficiency, giving preference to renewable over non-renewable energy suppliers, reducing waste and water consumptions and recycling.

SITA's Environmental Policy provides a set of environmental principles that direct its actions and responsibilities. This policy applies to all SITA employees and contractors worldwide, and the same is expected from SITA's suppliers and partners.

I believe that within the air transport community, SITA has an extraordinary role to play. Its global presence, coupled with all the changes SITA sees in the industry and the broader environment, makes it particularly aware of the challenges ahead. Working with a wide range of air transport associations in global and regional forums, SITA participates in efforts to develop common approaches, standards, and technology, helping the industry become more efficient and ultimately more environmentally sustainable.

SITA's business, reputation, and environmental impact ultimately rely on its individual and collective actions. I ask for your support in ensuring that SITA builds these environmental principles into how it conducts business, everywhere, every day.

David Lavorel
CEO

2 SCOPE AND RESPONSIBILITIES

This document is a reference for SITA employees and contractors concerning SITA's commitment to reducing its environmental impact and ensuring that the organization operates in an environmentally responsible manner while providing IT and telecommunications solutions to the air transport industry.

For situations not explicitly mentioned in this policy that are not covered by applicable legislation or international or national standards, then industry best practice and professional judgment should be used when determining what is and is not acceptable.

Guidance on what to do in case of uncertainty can always be obtained from the Head of Sustainability and CSR at csr@sita.aero or from SITA's Legal teams.

For the latest version of this document, please refer to the Corporate Policies section of the SITA Intranet here: corporate policies -The Hub (sharepoint.com)

2.1 SITA's Environmental Policy

This Environmental Policy is communicated to all SITA employees and contractors and is freely available on SITA's internal intranet and external website. It sets out SITA environmental principles and the actions expected from employees in the application of these principles:

- Compliance with legal, environmental requirements, and other obligations, voluntary or mandated
- Reducing the environmental impact of its business
- Preventing pollution
- Engaging with interested parties
- Continuous improvement

SITA Third Parties must comply with their contractual obligations to SITA and follow the principles in this Policy.

2.2 Compliance with the Environmental Policy

All SITA employees and contractors are expected to comply with SITA's Environmental Policy, in particular:

- Conduct their work in a manner that complies with applicable environmental regulations in the location of their working environment and SITA's requirements.
- Be aware of the potential environmental consequences of their actions and take care to minimize any adverse effects, including but not limited to the procurement of goods and services and throughout the life cycle of any SITA IT and network infrastructure and portfolio services.
- Promptly report or otherwise address conditions or incidents that could result in an adverse environmental impact.

Disregard or violation of the Environmental Policy may lead to any or all the following:

- Adverse impacts on the environment in the physical locations where SITA operates (for itself or on behalf of customers)
- Breach of environmental legislation
- Financial impacts through fines or loss of business
- Reputational impacts
- Physical injuries
- Disciplinary action for SITA employees in non-compliance with the Environment Policy.

Periodic audits will be undertaken within the business to monitor compliance with various aspects of this Policy.

This policy is promoted throughout SITA organization and is reinforced annually with mandatory Environmental Awareness online training for all employees and contractors working on SITA premises.

3 SITA'S COMMITMENT

SITA believes that being a responsible business makes us a better business.

SITA employees must encourage, promote and carry out good environmental practices to conserve natural resources and provide effective stewardship of the environment.

To that end, SITA is committed to making environmental management an integral core value and vital part of SITA's culture by:

- Integrating environmental considerations into all work practices.
- Informing employees and critical stakeholders of applicable environmental regulations and SITA environmental requirements.
- Providing the resources, processes, and procedures necessary for employees to conduct their work following applicable environmental regulations.
- Promoting greenhouse gas (GHG) reduction pollution prevention, waste minimization, and conservation across its organization.
- Promoting the effective use of innovative environmental technologies and practices.
- Fostering a work environment where employees are encouraged to report and raise environmental concerns.
- Developing environmental goals and targets relevant to SITA's operations and taking actions to achieve those goals and targets.
- Complying with all applicable international, national, and local laws, regulations, international standards, and other voluntary environmental requirements.

While this Policy cannot cover all the rules and requirements that apply to every situation, its values and principles can help employees make the right decisions.

This policy is complemented by the SITA Code of Conduct, SITA Purchasing Policies, SITA Travel Policy, SITA Supplier Code of Conduct, SITA IT Assets Recycling Policy, and SITA Energy Management Policy.

4 ENVIRONMENTAL PRINCIPLES

SITA recognizes that elements of its business will impact the environment and is committed to reducing these environmental impacts through the efficient operation of the company in every country where SITA operates. SITA manages this through policies, processes, targets, and actions.

4.1 Compliance with legal requirements and other applicable obligations

All SITA employees must always comply with the applicable environmental legislation. This includes international, national, or local laws and international standards related to its business operations, products, or processes. Other applicable obligations may be required, and compliance with these areas must be met.

Adherence to relevant compliance or legislative requirements includes, but is not limited to:
- Any products manufactured and any service rendered by SITA
- Equipment specified and purchased by SITA for use in the company's offices and sites
- Equipment purchased and managed or maintained by SITA for use by customers
- Managing equipment at end-of-life
- Waste management, including recycling

4.2 Reducing the environmental impact of SITA business

Under its Planet + program, SITA has been a certified CarbonNeutral® Company since 2021, complying with the CarbonNeutral® Protocol. This protocol requires SITA to define emissions related to its operations, measure them, reduce them, and communicate its reduction plan, target achievements, and any mitigation plan.
The capture, tracking, and monitoring of identified environmental impacts, and progress against these targets, are measured via SITA's internal platform. It is complemented by a yearly audit performed by an independent external sustainability assessor. It measures SITA greenhouse gas (GHG) emissions, water consumption, and waste generated directly or indirectly by its operations.

Using those measurements, SITA has identified that its primary emissions sources are air business travel and energy used at SITA premises. Reductions of those emissions are addressed by the Travel Smart and Office Smart programs, subsets of the Planet + program.

Annual reductions targets are set, and a plan of continuous improvement is in place to address in-house efficiency measures, adoption of renewable energy, and external emission reduction projects, which are required to maintain the CarbonNeutral® certification.

Targets are shared on the environmental section of SITA's intranet site, and its progress is publicly reported annually in the CSR Report.

Further to this CarbonNeutral® certification, SITA has announced in Q1 2022 its commitment to the Science Based Targets initiative (SBTi) Net-Zero Standard and Business Ambition for 1.5°C campaign to tackle its climate impact at the pace and scale required by climate science. SITA is setting robust and ambitious science-based emission reduction targets to reach net-zero by 2050 and align with limiting global warming to 1.5°C, which are expected to be validated by the SBTi committee by Q1 2023 at the latest. Those targets are expected to address all emissions SITA generates, directly and indirectly, from its operations and the goods and services bought from its suppliers or from SITA products and services once used by its customers.

4.2.1 Reducing energy consumption and related GHG emissions

As part of its Office Smart program, SITA is committed to reducing its energy consumption and continuously improving its energy management performance by:

- Measuring electricity, energy consumption, and associated GHG emissions in SITA premises at least once every quarter
  - implementing energy management systems for the measurement and control of energy consumption,
  - undertaking an annual externally audited GHG assessment across all our operations.

- Selecting or developing reliable, accessible, and affordable energy supplies with a lesser environmental impact with a preference for renewable energies

  - where renewable energy is an option, it is the defacto choice of energy,
  - where renewable energy is not yet an option, SITA raises its need either to its landlord or to its energy providers regularly to speed up its access,
  - in locations where renewable energy is not available, until the time renewable energy is an option, SITA purchases Energy Attributes Certificates (EAC) or Renewable Energy Certificates (REC) for the equivalent amount of its electricity yearly consumption,
  - in the location SITA owns, look for the possibility of adding renewable energy sources such as solar panels.

- Integrating energy performance in the long-term planning of our location strategy
  - selecting smart and energy-efficient IT, lighting, heating, and air conditioning devices,
  - considering energy efficiency and design for energy performance as part of our procurement process.

- Encouraging employees to make continuous efficient use of energy
  o ensuring that all employees directly responsible for our energy management program have the appropriate information and resources, knowledge, and competence,
  o encouraging the reduction of energy consumption through the provision of information to employees, suppliers, and contractors.

- Setting yearly measurable reduction targets on electricity and energy consumption and associated GHG emissions arising from SITA premises
  o setting our energy objectives and energy performance indicators annually,
  o setting objectives and targets for energy consumption within our ISO14001:2015 certified environmental management system,
  o tracking progress against targets for energy consumption reduction and emissions reductions,
  o reporting and communicating internally and externally on electricity and energy consumption, reduction, and target achievement.

- Ensuring up-to-date compliance with any local, regional, and international environmental policy, framework, and laws
  o ensuring compliance with any local, regional, and international environmental policy, framework, and laws,
  o regularly reviewing the policy and relevant procedures and integrating with our Environmental and Energy Management Systems.

- Enhancing SITA products and services with energy efficiency and savings features by design
  o including energy management efficiency consideration when designing or evolving any new SITA product and services to reduce customers' electricity consumption when using them,
  o offering services helping SITA customers measure, monitor, and reduce energy consumption on activities other than those delivered by SITA (for example, OptiClimb product measuring and optimizing aircraft fuel burn).

- Selecting suppliers and partners embedding energy efficiency considerations in their products specs
  o including energy management criteria in the supplier selection procurement matrix,
  o monitoring supplier's energy management practices.

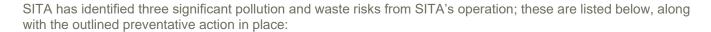### 4.2.2 Reducing CO2 emissions generated from business travels

As part of its Travel Smart program, SITA is committed to reducing GHG emissions arising from business travel and encourages staff to:

- Reducing business travel related to internal meetings to its bare minimum and using collaborative tools such as Microsoft Teams, cameras, and smart board equipment available in most SITA offices instead.
- Optimizing the location and the number of staff traveling to attend the same customer meeting or event.
- Selecting the optimal flight option in terms of GHG emissions based on the information provided by the travel self-booking tool: Economy Class seats only, preference for direct flights, and new generation aircraft.
- Selecting rail options rather than flight options wherever possible.
- Selecting public transport or shuttles rather than taxis wherever possible and when sanitary conditions allow.

4.3 Preventing pollution

SITA is committed to preventing pollution and generating waste in its operations and manufacturing of products. The principles of "reduce, reuse and recycle" should be adopted by all employees. For example, where recycling facilities are provided, employees must use them.

SITA has identified three significant pollution and waste risks from SITA's operation; these are listed below, along with the outlined preventative action in place:

- Reducing and recycling waste by focusing on actions and initiatives within its control and influence
- Management of end-of-life IT equipment and e-waste
- Presence of diesel generators at SITA sites

4.3.1 Recycling and reducing waste

This includes but is not limited to the following:

- SITA manages the recycling of paper, cardboard, and packaging through multiple initiatives, ranging from confidential paper and desktop recycling to recycling in common areas, including print areas/break rooms, and recycling cardboard through landlord channels.

- SITA has a variety of PET/plastics recycling initiatives for recycling plastic, drink containers, and kitchen waste in its offices. The initiatives include sorting by local cleaning teams and removing single-use cups, cutlery, and other supplies in its major offices, with other sites to follow. SITA has introduced 'Bean-to-cup' coffee machines in many offices and facilities to recycle coffee capsules where they are used.

- SITA has made great efforts to reduce paper consumption. SITA achieved this through implementing multifunction device printers (with double-sided black and white printing as standard), restricted printing enabled by making a PIN essential to reduce unnecessary print.

- Where possible, water-reducing equipment is installed in its offices (e.g., water faucets and short flush toilets).

- In Burlington, Canada, SITA kiosk assembling facility, Kraft cardboard used for kiosk packaging is 100% recycled, and cardboard packaging from inbound shipments is reused to send components and spares to customer sites. SITA re-uses wooden pallets for outward shipping where possible, but where this is not possible, pallets are recycled locally.

- Information campaigns are being organized company-wide to increase awareness and encourage behavioral change.

4.3.2 Management of end-of-life IT equipment and e-waste

Responsible management of end-of-life IT assets, be they SITA's assets or those of its customers, is an integral part of SITA's Environment Policy. SITA has strict governance to ensure these assets' safe and secure recycling.

In every location where it operates, SITA abides by all local, national, and international laws governing the movement, treatment, and handling of IT waste. In areas without documented environmental laws, SITA acts as a responsible environmental guardian, recycling equipment safely and securely, with minimum environmental impact.

SITA works with a limited number of approved suppliers worldwide to effectively monitor and ensure compliance with the high standards SITA set. Only selected pre-approved suppliers can be used for IT asset recycling. These suppliers must be aware of and comply with the Basel Convention and/or the Waigani Convention and other conventions governing the transboundary movements of e-waste. In Europe and elsewhere, its recycling partners must abide by the WEEE Directive and similar national-level legislation and schemes mandating waste separation and promoting the recovery, reuse, and recycling of products and components.
Around the world, SITA's standard for the disposal of equipment is to achieve the maximum recycling of component material, ensuring as little material as possible is incinerated or landfilled.

End-of-life kiosks are returned to the site from the customers' premises, and all components are re-used or recycled appropriately.

Any movement of electronic waste for recycling or disposal must comply with the Basel Convention and/or the Waigani Convention.

The processes that SITA has put in place for dealing with the recycling of electrical and electronic equipment are managed through the relevant departments:

- Corporate IT equipment: SITA Corporate Desktop and Information Services
- Corporate Data Center equipment: Local facilities and SITA Corporate Desktop (in conjunction with CSR and Global Spares and Logistics Management (GLSM / SGS))
- Equipment used for development or test equipment not covered by SITA Corporate Desktop: SITA Global Logistics and Spares Management (GLSM / SGS)
- Operational equipment: SITA Global Logistics and Spares Management (GLSM / SGS)

Recycling initiatives are also in place in some offices for batteries and other materials, including printer cartridges, chargers, electrical peripherals, and scrap metal, through local providers.

SITA employees are prohibited from:

- Recycling or disposing of electrical and electronic waste other than in accordance with the relevant international, national, or local legislation and SITA's defined processes.

- Disposing of electrical and electronic waste in landfill, underwater, buried or incinerated, or in any other manner that impacts the environment (air, land, water) or the health and safety of any person or community.

4.3.3 Presence of diesel generators at SITA sites

Where diesel generators are present at SITA sites, the correct permits and licenses must be in place, and a program of testing and maintenance executed regularly.

Safety information and training must be provided to those working near the generators, including hazardous substances and spill handling.

4.4 Procurement

SITA knows that its environmental responsibility goes beyond what SITA can achieve alone as a business and that its supply chain has a vital part to play. SITA needs to ensure its suppliers, as well as their supply chain, act ethically and sustainably. Suppliers, and their supply chain, are expected to take the necessary steps to protect the environment in the various regions of the world in which they operate.

At a minimum, SITA's suppliers must comply with all applicable environmental laws, regulations, and sound industry practices, such as chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting.

Suppliers must comply with any additional environmental requirements described in SITA's design and product specifications when applicable. SITA prefers suppliers whose goods or services have a reduced environmental impact. As part of the procurement process, potential suppliers must demonstrate how they fully meet its requirements.

4.5 Logistics

SITA tracks emissions from inbound and outbound shipping as part of its yearly GHG emissions audit performed by an independent external assessor. Like any other GHG emissions, SITA is committed to reducing or neutralizing them as part of its ambition to reduce its environmental impact.

For the shipping of goods through third-party distributors, SITA considers the most environmentally responsible shipping options available from rail, road, maritime, and air transportation, balancing the decision with other criteria such as cost, duration, and quality.

4.6 Transparency

Communications from SITA will be honest, transparent, and timely. SITA makes information about its environmental policy and activities available to stakeholders on its corporate website and in its annual CSR Report.

Employee information is available on the company's intranet and internal communication channels. Interested parties can contact SITA through the company website, email, telephone, and social media channels to learn more about its environmental commitments and programs.

4.7 Continuous improvement

SITA commits to continuous improvement and uses annual environmental targets to set in-house efficiency measures and develop renewable energy and external emission reduction programs. SITA uses the ISO14001:2015 standard to drive continuing assessment of its environmental activities through operational and management reviews and internal and external audits at 8 of its key sites.

5 RELATED POLICIES AND STANDARDS

- SITA Operational IT Asset Recycling Process
- SITA Purchasing Policy
- SITA Code of Conduct
- Corporate Travel Policy
- Company Health, Safety & Policy Policies

6 APPLICABLE LEGISLATIONS

SITA abides by international, national, and local laws and codes of practice regarding the environment. Such as:

- Waste Electrical and Electronic Equipment (WEEE)

- Basel Convention

- RoHS (Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (RoHS) Directive)

- Waigani Convention

Reviews to assess compliance to specific legislation related to the environmental impacts are undertaken at least annually. SITA's Regulatory Team supports identifying legislation that may be relevant to SITA's environmental impacts. Guidance and advice from specialized external counsel may be called upon to ensure that any legal requirements that apply to SITA in response to specific needs are identified.

SITA For questions about specific in-country legislation, please contact Compliance@sita.aero and CSR@sita.aero

7 RAISING CONCERNS

If any employee has any environmental concerns, they may be raised in confidence to csr@sita.aero or through Radar, its early warning system.