



SITA THIRD PARTY CODE OF CONDUCT



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SITA, and its wholly-owned subsidiaries and affiliates (collectively “SITA”), is committed to doing business the right way by acting honestly, fairly and with high standards of integrity, including in its relations with business partners (i.e. any parties with whom SITA does business including, but not limited to primes, subcontractors, agents, lobbyists, independent contractors, consultants, distributors, suppliers, or other agents, and intermediaries, collectively “**SITA Third Parties**” or “**Third Parties**”).

The actions of SITA Third Parties, and its own supply chain, can have a direct impact on SITA’s 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 of Conduct. 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.

It is SITA policy to comply with the various legislations, statutes, and regulations in force in the many jurisdictions where it does business and expects SITA Third Parties, and its supply chain, to do the same. SITA Third Parties are required not only to comply with its contractual obligations to SITA, but also to follow the standards of ethics and business conduct of this Code.

Legal and Regulatory Compliance

SITA Third Parties shall comply with all applicable laws and regulations in all locations where they conduct business, especially with respect to strict compliance with all laws and regulations on bribery, corruption and prohibited business practices. SITA Third Parties shall not use other subcontractors or other suppliers to deliver on its commitments to SITA unless agreed in writing between the parties. SITA Third Parties should only assign personal with adequate expertise to perform the work.

Integrity and Respect

SITA is committed to acting with integrity and to follow the law. SITA Third Parties must be familiar with and adhere to the legislations relevant to their business wherever it is conducted. SITA expects its Third Parties to act with integrity and respect and to demonstrate courtesy and civility with others, including their own employees and SITA’s employees and customers.

Antibribery and Corruption

SITA competes in the marketplace solely on the merits of its products and solutions and does not tolerate bribery and corruption in any form. SITA is committed to cultivating and maintaining a culture of zero tolerance for corrupt practices. SITA Third Parties must:

- Take all measures necessary to abolish corrupt practices by not offering, paying or accepting bribes or kickbacks or any other kind of improper payment, including facilitation payments, for any purpose whether directly or through a third party.
- Keep accurate records so payments are honestly described, and company funds are not used for unlawful purposes.

To help SITA comply with all anti-bribery and corruption laws and regulations that may be applicable to its business world-wide (“Anti-Corruption Laws”), SITA Third Parties shall not take any actions, or omit to take any actions, that result or may result in any violations of Anti-Corruption Laws, including by its own business partners.

Inappropriate Gifts or Commissions

SITA Third Parties shall NOT offer, give, receive, or solicit any item of value to improperly influence the actions of a person (including SITA employees, representatives, customers or government officials) in order to obtain or retain business or an unfair advantage in the conduct of business, or to induce or reward improper conduct.

Items of value can include, but are not limited to, payments of money, credit loans, travel and accommodations expenses, gifts, meals, and entertainment, political contributions and charitable donations, free use of company services, facilities or property, favors that have a value to the recipient – for instance – offering employment to a family member, etc.





Lobbying with Government Officials and Political Contributions

Lobbying is any activity that aims to influence legislation, regulation, policies, and rules. In some jurisdictions, however, the definition of 'lobbying' may also cover procurement and business development activity. SITA Third Parties shall not lobby any government official on SITA's behalf unless it has expressly contracted with SITA to do so and all applicable registrations and disclosures have been made in accordance with the law. SITA Third Parties shall not make political contributions or donations on SITA's behalf.

Compliance with Export Laws

SITA Third Parties who serve SITA across national borders shall understand and abide by all export, import, or re-export laws and regulations applicable to the goods or services that they are involved with on behalf of SITA.

Relations with SITA and SITA Customers

In the provision of services, SITA Third Parties may visit and/or work at a SITA or a SITA Customer premise. SITA Third Parties visiting or working at a SITA or SITA Customer premise must comply with the applicable policies, procedures and rules and treat the premises accordingly.

Training

SITA Third Parties shall ensure that their employees take applicable training provided by SITA, when required.

Intellectual Property and Confidentiality

SITA Third Parties shall maintain SITA's and its customers' confidential information by not transferring, publishing, using, reproducing or disclosing it without SITA's express written authorization. To the extent that confidential information contains personally identifiable information or other data subject to protection, SITA Third Parties shall comply with all applicable privacy and standards, including those imposed by SITA's customers through a contract or otherwise.

In the development of work products, SITA Third Parties shall observe the intellectual property rights of others, including SITA's and its customers. SITA Third Parties shall also respect and protect the intellectual property rights of SITA and its customers.

Forced and Child Labor

SITA Third Parties must not use forced or involuntary labor of any type (e.g., forced, bonded, indentured or involuntary prison labor). SITA Third Parties must not employ any person below the local legal minimum age (in the country where work is performed), unless the person is employed as part of a recognized professional apprenticeship program.

Compensation and Working Hours

As a minimum, SITA Third Parties will comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits. Wages should be paid regularly, on time and be fair in respect of work performance. Weekly working time must not exceed the legal limit, and overtime work should always be voluntary and properly compensated. Employees should be granted their stipulated annual leave and sick leave without any repercussions and should take their stipulated maternity or paternity leave in accordance with national laws.

Non-Discrimination

All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics or beliefs. Subject to local law, SITA Third Parties will not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, disability, marital status, pregnancy or political affiliation.

Freedom of association

SITA Third Parties agree to work directly with employees to find solutions to any outstanding legal and employment issues while at all times respecting any applicable rights to be represented. Suppliers agree to comply with local laws so that workers' rights are maintained, including the rights to join labor unions, seek representation and/or bargain collectively.





Environment

SITA Third Parties should take the necessary steps to protect the environment in the various regions of the world in which they operate. At a minimum, SITA Third Parties must comply with all applicable environmental laws, regulations and sound industry practice, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting. Suppliers must also comply with any additional environmental requirements as described in SITA's design and product specifications. SITA prefers suppliers whose goods or services have a reduced environmental impact.

Health and Safety

SITA Third Parties must provide employees with a safe and healthy working environment in accordance with applicable laws and industry standards, with access to adequate health and safety training. Suppliers must have in place health and safety policies and standards designed to reduce work-related injury and illness and promote the general health of employees. These policies must be made available to employees.