

# SITA Modern Slavery, Forced Labor and Child Labor Statement

For the financial year ending 31 December 2025

This statement is published in accordance with both section 54 of the UK Modern Slavery Act 2015 and the Fighting Against Forced Labor and Child Labor in Supply Chains Act (Canada), as part of SITA's commitment to transparency and responsible business conduct.

It sets out the steps taken by SITA and its subsidiaries to prevent and mitigate the risks of modern slavery, forced labor and child labor in its operations and global supply chains during the year ended 31 December 2025.

## **Our organization, business and supply chains**

SITA is a leading provider of IT and digital solutions to the air transport industry, serving airports, airlines, governments and air navigation service providers worldwide. SITA operates globally across multiple jurisdictions and employs a highly skilled workforce, primarily delivering technology-based services.

SITA's supply chains principally comprise technology hardware, software, professional services, digital infrastructure, facilities management, travel services, and indirect procurement categories. SITA recognizes that risks of forced labor or child labor may arise in upstream supply chains, particularly in hardware production, logistics, and certain service sectors.

## **Policies and governance**

We recognize the immense human cost of modern slavery and human trafficking, and we are committed to taking meaningful steps to help combat it. As a signatory of the United Nations Global Compact (UNGC), we align our strategies and operations with the Ten Principles on human rights, labor, the environment, and anti-corruption. For more information on this, refer to our [2024 Impact Report](#) and [the Sustainability section](#) of our corporate website.

Respect for human rights is embedded in SITA's values, governance frameworks, and ways of working. Key policies and mechanisms supporting this commitment include SITA's [Code of Conduct](#), [SITA Supplier Code of Conduct](#), Ethics and Compliance framework, Sustainable Procurement Charter, and whistleblowing ([RADAR](#)) mechanism.

These policies and mechanisms apply globally. They are informed by internationally recognized standards, including the UN Guiding Principles on Business and Human Rights and the International Labour Organization's core labor conventions, and are regularly reviewed to ensure alignment with evolving legal and stakeholder expectations.

Oversight of modern slavery and human rights-related risks is embedded within SITA's enterprise risk management, sustainability and corporate social responsibility, procurement governance, and ethics and compliance structures.

## Due diligence and risk management

SITA adopts a risk-based approach to identifying, assessing, and managing risks related to forced labor and child labor. During 2025, this included:

- Integrating human rights and labor-related risk considerations into supplier onboarding and supplier assessments, with enhanced due diligence applied in higher-risk categories or geographies;
- Embedding human rights expectations into contractual clauses and supplier standards where appropriate;
- Leveraging internal risk, compliance and control functions to identify, escalate and manage potential human rights-related concerns.

SITA continues to prioritize proportionate due diligence, governed by our Global Purchasing Policy and aligned with sustainability and risk frameworks, focusing on areas where risk is most likely to arise rather than applying uniform controls across all suppliers. Our standard supplier Terms and Conditions set out the requirements for suppliers when supplying SITA, and they refer to the SITA Supplier Code of Conduct, our expected behaviors and ways of working.

SITA's Management monitors, implements and operates mitigating actions as well as assesses the latest posture of this risk as part of the quarterly Enterprise Risk Management (ERM) process. The outcome of the ERM reviews is reported quarterly by the Internal Audit and Risk Management (IA&RM) to the Audit and Risk Management Committee (ARMCom).

Modern slavery, human trafficking, child labor, and forced labor were acknowledged as a potential risk to SITA's compliance and reputation. Such risk is recorded in the

SITA Enterprise Risk Register. The risk scope includes the entire SITA group, including its owned and controlled subsidiaries, and joint ventures.

## **Identified risks and mitigation**

Based on the nature of its operations, SITA considers the risk of forced labor or child labor in its own workforce to be low. Higher-risk areas are more likely to occur further upstream in complex global supply chains, particularly in relation to certain technology hardware components, logistics, and subcontracted services.

During the reporting period, SITA did not identify any confirmed instances of forced labor or child labor within its own operations. Where potential risks are identified in supply chains, SITA commits to engaging with suppliers to seek clarification, improvement measures or, where necessary, escalation or disengagement.

In 2025, SITA started developing a Human Rights Charter. The Charter, which will apply to SITA globally, including its owned and controlled subsidiaries, will further advance the integration of our operations and supplier relationships with international human rights frameworks.

## **Remediation and grievance mechanisms**

SITA maintains mechanisms to enable concerns to be raised safely and without fear of retaliation. These include management channels and RADAR, SITA's independent, confidential whistleblowing platform available in multiple languages.

If impacts related to forced labor or child labor were to be identified, SITA is committed to supporting appropriate remediation, informed by international human rights standards, and in collaboration with relevant stakeholders.

No instances requiring remediation were identified during the year ended 31 December 2025.

## **Training and awareness**

Our employees receive mandatory training on responsible procurement and human rights as part of our Code of Conduct program. This training is a requirement for all new hires and needs to be completed annually for all staff. Completion rates are tracked and reported to the SITA Management teams.

We also foster awareness through regular communications, webinars, and leadership messaging that emphasize our ethical commitments, including our unwavering stance against modern slavery and our acknowledgment of the duty our colleagues at SITA and our suppliers' staff must uphold human rights in our operations and in our supply chain.

## Assessing effectiveness

SITA continues to strengthen its ability to assess the effectiveness of its actions through:

- Ongoing review of supplier due diligence processes,
- Monitoring of grievance and speak-up channels,
- Integration of human rights considerations into enterprise risk management and sustainability reporting.

SITA recognizes that transparency and continuous improvement are essential and will continue to enhance its approach year-on-year.

## Approval

This statement was approved by the appropriate governing body of SITA in accordance with the UK Modern Slavery Act 2015 and the Fighting Against Forced Labor and Child Labor in Supply Chains Act (Canada).

Signed:

David Lavorel  
CEO  
22 May 2026